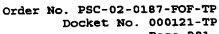




Florida Plan

SEEM Submetrics

Item No.	Submetric
439	O-9 Firm Order Confirmation Timeliness Partially Mechanized Line Splitting
439	O-9 Firm Order Confirmation Timeliness Partially Mechanized Local Interoffice Transport
441	O-9 Firm Order Confirmation Timeliness Partially Mechanized Local Interconnection Trunks
	O-9 Firm Order Confirmation Timeliness Partially Mechanized LNP Standalone
442	O-9 Firm Order Confirmation Timeliness Partially Mechanized INP Standalone
443	O-9 Firm Order Confirmation Timeliness Partially Mechanized Line Sharing
444	O-9 Firm Order Confirmation Timeliness Partially Mechanized Resale PBX
445	O-9 Firm Order Confirmation Timeliness Partially Mechanized Residence
446	The State of the Manhamined Springh Ports
448	The Market and I Diff Combo Other
449	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Digital Loop ≥DS1
450	Del III No de la
451	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE ISDN
452	The Land Combas
453	The state of the s
454	The state of the s
455	THE PART OF THE PA
456	in the state of th
	2 w Analog Loop Design
457	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 -
	2 w Analog Loop w/LNP Design
458	
	2 w Analog Loop w/LNP Non Design
459	
460	2 w Analog Loop w/INP Design P-3A Percent Missed It:stallation Appointments Including Subsequent Appointments Dispatch ≥ 10 -
460	2 w Analog Loop w/INP Non Design
461	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 -
	2 w Analog Loop Non-Design
462	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 -
	Resale Business
463	1,
	Resale Centrex
464	1.
	Resale Design
465	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 Resale ISDN
466	10 - 1 - 1 - 1 - 1 - 2 - 2 - 2 - 2 - 2 - 2
400	Local Transport

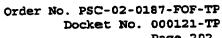


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Florida Plan

SEEM Submetrics

Item No.	Submetric
467	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch≥ 10 - Local Interconnection Trunks
468	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - LNP Standalone
469	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - INP Standalone
470	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Resale PBX
471	Resale Residence
472	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Combo Other
473	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Digital Loop \geq DS1
474	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Digital Loop $<$ DS1
475	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Dispatch - EELs
476	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE ISDN (includes UDC)
477	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Line Sharing
478	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Dispatch - UNE Line Splitting
479	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Dispatch - UNE Other Design
₹\$ 0	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Dispatch - UNE Other Non Design
481	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Switch ports
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥10 - UNE xDSL (ADSL, HDSL, UCL)
1	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch in ≥ 10 - UNE Loop and Port Combo
484	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Switch Based ≥ 10 - UNE Loop and Port Combo
485	2 w Analog Loop Design
486	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/LNP Design

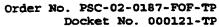


SEEM Submetrics



Florida Plan

Item No.	Submetric
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/INP Non Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/INP Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/LNP Non Design
490	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop Non-Design
491	Resale Business
492	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Centrex
493	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Design
494	Resale ISDN
495	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Local Transport
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch - Local Interconnection Trunks
497	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - LNP Standalone
498	INP Standalone
499	Resale PBX
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 Resale Residence
501	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch <-10 - UNE Combo Other
502	UNE Digital Loop ≥ DS1
503	UNE Digital Loop < DS1
504	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - EELs
505	UNE ISDN (includes UDC)
506	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Line Sharing
507	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Line Splitting





Florida Plan

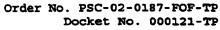
SEEM Submetrics

Item No.	Submetric
508	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Other Design
509	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Other Non Design
510	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Switch ports
511	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
512	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch in < 10 - UNE Loop and Port Combo
513	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Switch Based < 10 - UNE Loop and Port Combo
514	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop Design
515	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
516	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
517	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Non Design
518	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
519	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop Non-Design
520	10 - Resale Business
521	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale Centrex
522	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Licpatch ≥ 10 - Resale Design
523	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale ISDN
524	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Local Transport
525	Local Interconnection Trunks
526	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - LNP Standalone
527	10 - INP Standalone
528	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale PBX



SEEM Submetrics

tem No.	Submetric
529	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale Residence
530	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - UNE Combo Other
531	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Non Dispatch - FELs
532	≥ 10 - UNE ISDN (includes UDC)
533	> 10 - UNE Loop and Port Combo
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - UNE Line Sharing
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Non Dispatch - UNE Line Splitting
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - UNE Digital Loop ≥ DS1
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - UNE Digital Loop < DS1
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Non Dispatch - UNE Other Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Non Dispatch - UNE Other Non Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - UNE Switch ports
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - UNE xDSL (ADSL, HDSL, UCL)
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch Dispatch in ≥ 10 - UNE Loop & Port Combos
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch Switch Based ≥ 10 - UNE Loop & Port Combos
1	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispate < 10 - 2 w Analog Loop w/LNP Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispate
l	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Disputo
ļ	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispate
54	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispate < 10 - 2 w Analog Loop Non-Design

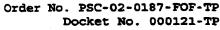


SEEM Submetrics



Florida Plan

Item No.	Submetric
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch
550	< 10 - Resale Business
551	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Resale Centrex
552	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Resale Design
553	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Resale ISDN
554	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Local Transport
555	P-3A Percem Missed Installation Appointments Including Subsequent Appointments - Non Dispatch - Local Interconnection Trunks
556	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - LNP Standalone
557	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - INP Standalone
558	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Resale PBX
559	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - Resale Residence
560	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE Combo Other
561	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - < 10 Non Dispatch - EELs
562	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE ISDN (includes UDC)
563	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE Loop and Port Combo
564	P-3A Percent Nissed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE Line Sharing
565	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - < 10 Non Dispatch - UNE Line Splitting
566	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 UNE Digital Loop ≥ DS1
567	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE Digital Loop < DS1
568	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - < 10 Non Dispatch - UNE Other Design
569	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - < 10 Non Dispatch - UNE Other Non Design
570	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch < 10 - UNE Switch ports

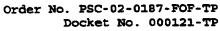


SEEM Submetrics



Florida Plan

	Table B-1: Tier 1 Submetrics (Continued)
Item No.	Submetric
571	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
572	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch - Dispatch in < 10 - UNE Loop and Port Combo
573	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch - Switch based < 10 - UNE Loop and Port Combo
574	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop Design
575	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
576	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
577	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
578	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/INP Non Design
579	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop Non-Design
580	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Business
581	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Centrex
582	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Design
583	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale ISDN
584	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Local Transport
585	Local Interconnection Trunks
586	10 - LNP Standalone
587	10 - INP Standalone
588	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale PBX
589	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Residence
590	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Combo Other
591	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Digital Loop ≥ DS1





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SEEM Submetrics

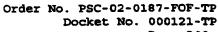
Item No.	Submetric
592	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Digital Loop < DS1
593	10 - EELs
594	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE ISDN (includes UDC)
595	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Line Sharing
596	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Line Splitting
597	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Other Design
598	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Other Non Design
599	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Switch ports
600	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - Dispatch ≥10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
601	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - Dispatch ≥ 10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
602	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch in ≥ 10 - UNE Loop and Port Combo
603	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Switch Based ≥ 10 - UNE Loop and Port Combo
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop Design
605	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop w/LNP Design
606	10 - 2 w Analog Loop w/LNP Non Design
607	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop w/INP Design
608	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop w/INP Non Design
609	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop Non-Design
610	10 - Resale Business
611	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Centrex
612	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Design



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SEEM Submetrics

Item No.	Submetric
613	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 Resale ISDN
614	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Local Transport
615	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - < 10 - Local Interconnection Trunks
616	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - LNP Standalone
617	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - INP Standalone
618	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale PBX
619	P-4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Dispatch < 10 Resale Residence
620	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Combo Other
621	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 UNE Digital Loop ≥ DS1
622	P-4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Dispatch < 10 - UNE Digital Loop < DS1
623	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - EELs
624	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE ISDN (includes UDC)
625	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Line Sharing
626	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Line Splitting
627	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Disputch < 10 - UNE Other Design
628	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Other Non Design
629	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Switch ports
630	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
631	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
632	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - Dispatch in < 10 - UNE Loop and Port Combo
633	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - Switch Based < 10 - UNE Loop and Port Combo

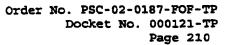




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SEEM Submetrics

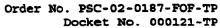
Item No.	Submetric
634	patch ≥ 10 - 2 w Analog Loop Design
635	patch ≥ 10 - 2 w Analog Loop w/LNP Design
636	patch ≥ 10 - 2 w Analog Loop w/INP Non Design
637	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
638	P-4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
639	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Disparch ≥ 10 - 2 w Analog Loop Non-Design
640	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Business
641	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Centrex
642	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Design
643	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 Resale ISDN
644	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Local Transport
645	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Local Interconnection Trunks
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - LNP Standalone
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - INP Standalone
648	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale PBX
649	patch ≥ 10 Resale Residence
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Combo Other
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - EELs
652	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE ISDN (includes UDC)
653	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution-Dispatch ≥ 10 - UNE Loop and Port Combo
654	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Line Sharing





SEEM Submetrics

Item No.	Submetric
	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch ≥ 10 - UNE Line Splitting
656 P-	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch ≥ 10 UNE Digital Loop ≥ DSI
	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Disactch ≥ 10 - UNE Digital Loop < DS1
pa	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch ≥ 10 - UNE Other Design
	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch ≥ 10 - UNE Other Non Design
	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch ≥ 10 - UNE Switch ports
661 P-	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Disactch ≥10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
662 P-	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch ≥10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch - Dispatch in ≥ 10 - UNE Loop and Port Combo
	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch - Switch Based ≥ 10 - UNE Loop and Port Combo
	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch < 10 - 2 w Analog Loop Design
	4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Non Dis- arch < 10 - 2 w Analog Loop Non-Design
667 P-	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch < 10 - 2 w Analog Loop w/LNP Design
668 P-	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch < 10 - 2 w Analog Loop w/LNP Non Design
pa	AlA Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Disactor < 10 - 2 w Analog Loop w/INP Design
pa	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch < 10 - 2 w Analog Loop w/INP Non Design
pa	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch < 10 - Resale Business
pa	4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch < 10 - Resale Centrex
pa	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- atch < 10 - Resale Design
pa	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch < 10 Resale ISDN
	-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dis- arch < 10 - Local Transport

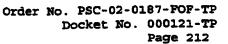


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SEEM Submetrics

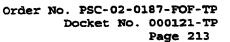
Item No.	Submetric
676	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Local Interconnection Trunks
677	patch < 10 - LNP Standalone
678	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - INP Standalone
679	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - Resale PBX
680	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - Resale Residence
681	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Combo Other
682	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - EELs
683	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE ISDN (includes UDC)
684	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non-Dispatch < 10 - UNE Loop and Port Combo
685	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Line Sharing
686	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Line Splitting
687	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Digital Loop ≥ DS1
688	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Digital Loop < DS1
689	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Other Design
690	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Other Non Design
691	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Switch ports
692	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
693	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
694	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Dispatch in < 10 - UNE Loop and Port Combo
695	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Switch-based < 10 - UNE Loop and Port Combo
696	P-7A Coordinated Customer Conversions Hot Cuts Timeliness% within Interval and Average Interval SL1 IDLC





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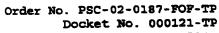
Item No.	Submetric
697	P-7A Coordinated Customer Conversions Hot Cuts Timeliness% within Interval and Average Interval SL1 Non Time Specific
698	P-7A Coordinated Customer Conversions Hot Cuts Timeliness% within Interval and Average Interval SL 1 Time Specific
699	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 IDLC
700	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 Time Non Specific
701	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 Time Specific
702	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Design - Dispatch
703	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Design - Non Dispatch
704	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Non Design - Dispatch
70 5	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Non Design - Non Dispatch
706	P-7 Coordinated Customer Conversions Internal Unbundles Loops with INP
707	P-7 Coordinated Customer Conversions Internal Unbundles Loops with LNP
708	P-8 Cooperative Acceptance Testing - % of xDSL Loc ADSL
709	P-8 Cooperative Acceptance Testing - % of xDSL Loc HDSL
710	P-8 Cooperative Acceptance Testing - % of xDSL Loc Other
711	P-8 Cooperative Acceptance Testing - % of xDSL Loc UNE UCL
712	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop Design
713	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
714	Loop w/LNP Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop w/INP Non-Design
718	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Resale Business
719	trex
720	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Resale Design





SEEM Submetrics

item No.	Submetric
721	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 Resale ISDN
722	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Local Transport
723	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch - Local Interconnection Trunks
724	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 LNP Standalone
725	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 INP Standal- one
726	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Resale PBX
727	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 Resale Residence
728	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Combo Other
729	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Digital Loop ≥ DS1
730	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Digital Loop < DS1
731	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - EELs
732	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE ISDN (includes UDC)
733	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch ≥ 10 - UNE Line Sharing
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Line Splitting
735	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Other Design
736	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Other Non Design
737	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Switch ports
738	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥10 - UNE xDSL (ADSL, HDSL, UCL)
739	- UNE Loop and Port Combo
740	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion - Dispatch - Switch Based ≥ 10 - UNE Loop and Port Combo
741	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop Design
742	Completion Director < 10 - 2 n/ Applica



SEEM Submetrics



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Table B-1: Tier 1	Submetrics	(Continued)
		

Item No.	Submetric ·
743	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop w/LNP Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop w/INP Design
746	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop w/INP Non-Design
747	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Business
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Centrex
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Design
750	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 Resale ISDN
751	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Local Transport
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch - Local Interconnection Trunks
1	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch < 10 - LNP Standalone
754	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - INP Standalone
755	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale PBX
ļ	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Residence
757	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Combo Other
758	Loop ≥ DS1
759	Loop < DS1
760	
761	(includes UDC)
762	Sharing
763	Splitting
764	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Other Design

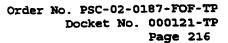
SEEM Submetrics



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Table B-1; Tier 1 Submetrics (Continued)		
Item No.	Submetric	
765	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Other Non Design	
766	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Switch ports	
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)	
768	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch - Dispatch in < 10 - UNE Loop and Port Combo	
769	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch - Switch Based < 10 - UNE Loop and Port Combo	
770	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop Design	
771	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design	
772	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non-Design	
773	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop Non-Design	
774	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Design	
775	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Non-Design	
776	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Business	
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Centrex	
778	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Design	
779	ISDN	
780	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Local Transport	
781	connection Trunks	
782	Standalone	
783	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 INP Standalone	
784	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale PBX	
785	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 Resale Residence	
	Residence	

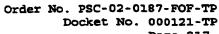


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SEEM Submetrics

item No.	Submetric
į	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Combo Other
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - EEL's
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE ISDN (includes UDC)
789	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch ≥ 10 - UNE Loop and Port Combo
790	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Line Sharing
791	Line Splitting
792	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 UNE Digital Loop ≥ DS1
793	Digital Loop < DS1
794	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Other Design
795	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Other Non Design
796	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Switch ports
197	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE xDSL (ADSL, HDSL, UCL)
798	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Dispatch in ≥ 10 UNE Loop & Port Combos
799	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Switch Based ≥ 10 UNE Loop & Pan Combos
800	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispetch < 10 - 2 w Analog Loop Design
801	Complete Non Director 10 - 2 mg
802	Analog Loop w/LNP Non-Design
803	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - 2 w Analog Loop Non-Design
804	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - 2 w Analog Loop w/INP Design
805	Analog Loop w/INP Non-Design
806	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resale Business
807	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resale Centrex

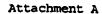


SEEM Submetrics

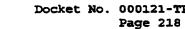


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Item No.	Submetric
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resale Design
809	
810	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Local Transport
811	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Local Inter- connection Trunks
812	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 LNP Standalone
813	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 INP Standalone
8]4	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resale PBX
815	Residence
816	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Combo Other
817	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - EEL's
818	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch < 10 - UNE ISDN (includes UDC)
819	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 - UNE Loop and Port Combo
820	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Line Sharing
821	Line Splitting
822	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 UNE Digital Loop ≥ DS1
823	Digital Loop < DS1
824	Other Design
825	Other Non Design
826	Switch ports
827	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
828	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Dispatch in < 10 - UNE Loop and Port Combo
829	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Switch-based < 10 - UNE Loop and Port Combo



Order No. PSC-02-0187-FOF-TP Docket No. 000121-TP

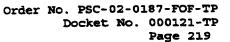




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SEEM Submetrics

Item No.	Submetric
830	TGP-2 Trunk Group Performance ALEC Specific





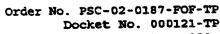
SEEM Submetrics

2. Tier 2 Submetrics

Table B-2 contains a list of Tier 2 submetrics.

Table B-2: Tier 2 Submetrics

item No.	Tier 2 Sub Metrics
1	B-1 Invoice Accuracy Interconnection
2	B-1 Invoice Accuracy Resale
3	B-1 Invoice Accuracy UNE
4	B-2 Mean Time to Deliver Invoices - CRIS
5	B-2 Mean Time to Deliver Invoices - CABS
. 6	B-3 Usage Data Delivery Accuracy
7	C-3 Collocation Percent of Due Dates Missed Physical Caged - Augment
8	C-3 Collocation Percent of Due Dates Missed Physical Caged - Initial
9	C-3 Collocation Percent of Due Dates Missed Physical Cageless - Augment
10	C-3 Collocation Percent of Due Dates Missed Physical Cageless - Initial
11	C-3 Collocation Percent of Due Dates Missed Virtual Combined (State)
12	C-3 Collocation Percent of Due Dates Missed Virtual - Augment
13	C-3 Collocation Percent of Due Dates Missed Virtual - Initial
14	CM-1 Timeliness of Change Management Notices
15	CM-1 Timeliness of Documents Associated with Change
16	MR-1 Percent Missed Repair Appointments Dispatch - 2 w Analog Loop Design
17	MR-1 Percent Missed Repair Appointments Dispatch - 2 w Analog Loop Non-Design
18	MR-1 Percent Missed Repair Appointments Dispatch - Resale Business
19	MR-1 Percent Missed Repair Appointments Dispatch - Resale Centrex
20	MR-1 Percent Missed Repair Appointments Dispatch - Resale Design
21	MR-1 Percent Missed Repair Appointments Dispatch - Resale ISDN
	MR-1 Percent Missed Repair Appointments Dispatch - Local Transport
23	MR-1 Percent Missed Repair Appointments Dispatch - Local Interconnection Trunks
24	MR-1 Percent Missed Repair Appointments Dispatch - Resale PBX
25	MR-1 Percent Missed Repair Appointments Dispatch - Resale Residence
26	MR-1 Percent Missed Repair Appointments Dispatch - UNE Combo Other
27	MR-1 Percent Missed Repair Appointments Dispatch - UNE Digital Loop ≥ DS1
28	MR-1 Percent Missed Repair Appointments Dispatch - UNE Digital Loop < DS1
29	MR-1 Percent Missed Repair Appointments Dispatch - UNE ISDN (includes UDC)
30	
31	MR-1 Percent Missed Repair Appointments Dispatch - UNE Line Sharing
	MR-1 Percent Missed Repair Appointments Dispatch - UNE Switch ports
	MR-1 Percent Missed Repair Appointments Dispatch - UNE xDSL (ADSL, HDSL, UCL)
34	MR-1 Percent Missed Repair Appointments Non Dispatch - 2 w Analog Loop Design



SEEM Submetrics



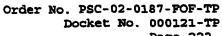
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	Table B-2: Tier 2 Submetrics (Continued)
ttem No.	Tier 2 Sub Metrics
35	MR-1 Percent Missed Repair Appointments Non Dispatch - 2 w Analog Loop Non-Design
36	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale Business
37	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale Centrex
38	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale Design
39	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale ISDN
40	MR-1 Percent Missed Repair Appointments Non Dispatch - Local Transport
41	MR-1 Percent Missed Repair Appointments Non Dispatch - Local Interconnection Trunks
42	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale PBX
43	MR-1 Percent Missed Repair Appointments Non Dispatch - Resale Residence
44	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Combo Other
45	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Digital Loop ≥ DS1
46	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Digital Loop < DS1
47	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE ISDN (includes UDC)
48	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Loop and Port Combo
49	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Line Sharing
50	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE Switch ports
51	MR-1 Percent Missed Repair Appointments Non Dispatch - UNE xDSL (ADSL, HDSL, UCL)
52	MR-2 Customer Trouble Report Rate - 2 w Analog Loop Design
53	MR-2 Customer Trouble Report Rate - 2 w Analog Loop Non-Design
54	MR-2 Customer Trouble Report Rate - Resale Business
55	MR-2 Customer Trouble Report Rate - Resale Centrex
56	MR-2 Customer Trouble Report Rate - Resale Design
57	MR-2 Customer Trouble Report Rate - Resale ISDN
58	
59	MR-2 Customer Trouble Report Rate - Local Interconnection Trunks
60	MR-2 Customer Trouble Report Rate - Resale PBX
61	MR-2 Customer Trouble Report Rate - Resale Residence
62	MR-2 Customer Trouble Report Rate - UNE Combo Other
63	
64	
65	
66	
67	
68	
69	
70	
71	MR-3 Maintenance Average Duration Dispatch - 2 w Analog Loop Non-Design



SEEM Submetrics

Item No.	Tier 2 Sub Metrics
	MR-3 Maintenance Average Duration Dispatch - Resale Business
73	MR-3 Maintenance Average Duration Dispatch - Resale Centrex
74	MR-3 Maintenance Average Duration Dispatch - Resale Design
75	MR-3 Maintenance Average Duration Dispatch - Resale ISDN
	MR-3 Maintenance Average Duration Dispatch - Local Transport
77	
	MR-3 Maintenance Average Duration Dispatch - Resale PBX
79	MR-3 Maintenance Average Duration Dispatch - Resale Residence
80	MR-3 Maintenance Average Duration Dispatch - UNE Combo Other
81	MR-3 Maintenance Average Duration Dispatch - UNE Digital Loop ≥ DS1
82	MR-3 Maintenance Average Duration Dispatch - UNE Digital Loop < DS1
83	MR-3 Maintenance Average Duration Dispatch - UNE ISDN (includes UDC)
84	MR-3 Maintenance Average Duration Dispatch - UNE Loop and Port Combo
85	MR-3 Maintenance Average Duration Dispatch - UNE Line Sharing
86	
87	MR-3 Maintenance Average Duration Dispatch - UNE xDSL (ADSL, HDSL, UCL)
88	MR-3 Maintenance Average Duration Non Dispatch - 2 w Analog Loop Design
89	MR-3 Maintenance Average Duration Non Dispatch - 2 w Analog Loop Non-Design
90	MR-3 Maintenance Average Duration Non Dispatch - Resale Business
91	MR-3 Maintenance Average Duration Non Dispatch - Resale Centrex
92	MR-3 Maintenance Average Duration Non Dispatch - Resale Design
93	MR-3 Maintenance Average Duration Non Dispatch - Resale ISDN
94	MR-3 Maintenance Average Duration Non Dispatch - Local Transport
95	MR-3 Maintenance Average Duration Non Dispatch - Local Interconnection Trunks
96	MR-3 Maintenance Average Duration Non Dispatch - Resale PBX
97	MR-3 Maintenance Average Duration Non Dispatch - Resale Residence
98	MR-3 Maintenance Average Duration Non Dispatch - UNE Combo Other
99	MR-3 Maintenance Average Duration Non Dispatch - UNE Digital Loop ≥ DS1
100	MR-3 Maintenance Average Duration Non Dispatch - UNE Digital Loop < DS1
101	MR-3 Maintenance Average Duranon Non Dispatch - UNE ISDN (includes UDC)
102	MR-3 Maintenance Average Duranon Non Dispatch - UNE Loop and Port Combo
103	MR-3 Mnimenance Average Duration Non Dispatch - UNE Line Sharing
104	MR-3 Maintenance Average Duration Non Dispatch - UNE Switch ports
105	MR-3 Maintenance Average Duration Non Dispatch - UNE xDSL (ADSL, HDSL, UCL)
106	MR-4 Percent Repeat Trouble within 30 Days Dispatch - 2 w Analog Loop Design
107	MR-4 Percent Repeat Trouble within 30 Days Dispatch - 2 w Analog Loop Non-Design
108	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale Business
100	

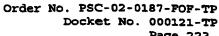




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	Table B-2: Tier 2 Submetrics (Continued)		
Item No.	Tier 2 Sub Metrics		
109	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale Centrex		
110	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale Design		
111	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale ISDN		
112	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Local Transport		
113	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Local Interconnection Trunks		
134	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale PBX		
115	MR-4 Percent Repeat Trouble within 30 Days Dispatch - Resale Residence		
116	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Combo Other		
117	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Digital Loop ≥ DS1		
118	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Digital Loop < DS1		
119	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE ISDN (includes UDC)		
120	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Loop and Port Combo		
121	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Line Sharing		
122	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE Switch ports		
123	MR-4 Percent Repeat Trouble within 30 Days Dispatch - UNE xDSL (ADSL, HDSL, UCL)		
124	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - 2 w Analog Loop Design		
125	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - 2 w Analog Loop Non-Design		
126	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Resale Business		
127	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Resale Centrex		
128	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Resale Design		
129	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch Resale ISDN		
130	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Local Transport		
131	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Local Interconnection Trunks		
132	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Resale PBX		
133	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - Resale Residence		
134	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Combo Other		
135	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Digital Loop ≥ DS1		
	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Digital Loop < DS1		
	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE ISDN (includes UDC)		
	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Loop and Port Combo		
139	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Line Sharing		
140	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE Switch ports		
141	MR-4 Percent Repeat Trouble within 30 Days Non Dispatch - UNE xDSL (ADSL, HDSL, UCL)		
142	MR-5 Out of Service (OOS) > 24 hours Dispatch - 2 w Analog Loop Design		
143	MR-5 Out of Service (OOS) > 24 hours Dispatch - 2 w Analog Loop Non-Design		
144	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale Business		
145	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale Centrex		

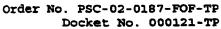




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SEEM Submetrics

item No.	Tier 2 Submetrics (Continued)
146	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale Design
147	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale ISDN
148	MR-5 Out of Service (OOS) > 24 hours Dispatch - Local Transport
149	MR-5 Out of Service (OOS) > 24 hours Dispatch - Local Interconnection Trunks
150	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale PBX
151	MR-5 Out of Service (OOS) > 24 hours Dispatch - Resale Residence
152	MR-5 Out of Service (OOS) > 24 hours Dispetch - UNE Combo Other
153	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE Digital Loop ≥ DS1
154	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE Digital Loop < DS I
155	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE ISDN (includes UDC)
156	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE Loop and Port Combo
157	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE Line Sharing
158	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE Switch ports
159	MR-5 Out of Service (OOS) > 24 hours Dispatch - UNE xDSL (ADSL, HDSL, UCL)
160	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - 2 w Analog Loop Design
161	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - 2 w Analog Loop Non-Design
162	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Resale Business
163	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Resale Centrex
164	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Resale Design
165	MR-5 Out of Service (OOS) > 24 hours Non Dispatch Resale ISDN
166	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Local Transport
167	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Local Interconnection Trunks
168	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Resale PBX
169	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - Resale Residence
170	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Combo Other
171	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Digital Loop ≥ DS1
172	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Digital Loop < DS1
173	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE ISDN (includes UDC)
174	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Loop and Port Combo
175	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Line Sharing
176	MR-5 Out of Service (OOS) > 24 hours Non Dispatch - UNE Switch ports
177	MR-5 Out of Service (OOS) > 24 hours Non Dispatch UNE xDSL (ADSL, HDSL, UCL)
178	O-11 FOC & Reject Completeness Fully Mechanized 2W Analog Loop Design
179	O-11 FOC & Reject Completeness Fully Mechanized 2W Analog Loop w/LNP Design
180	O-11 FOC & Reject Completeness Fully Mechanized 2W Analog Loop w/LNP Non Design
181	O-11 FOC & Reject Completeness Fully Mechanized 2W Analog Loop Non Design
182	O-11 FOC & Reject Completeness Fully Mechanized Resale Business

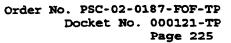




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SEEM Submetrics

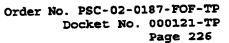
Item No.	Tier 2 Sub Metrics
183	O-11 FOC & Reject Completeness Fully Mechanized Resale Centrex
184	O-11 FOC & Reject Completeness Fully Mechanized Resale Design (Special)
185	O-11 FOC & Reject Completeness Fully Mechanized EEL's
186	O-11 FOC & Reject Completeness Fully Mechanized Resale ISDN
187	O-11 FOC & Reject Completeness Fully Mechanized Line Splitting
188	O-11 FOC & Reject Completeness Fully Mechanized Local Interoffice Transport
189	O-11 FOC & Reject Completeness Fully Mechanized Local Interconnection Trunks
190	O-11 FOC & Reject Completeness Fully Mechanized LNP Standalone
191	O-11 FOC & Reject Completeness Fully Mechanized Line Sharing
192	O-11 FOC & Reject Completeness Fully Mechanized Resale PBX
193	O-11 FOC & Reject Completeness Fully Mechanized Resale Residence
194	O-11 FOC & Reject Completeness Fully Mechanized Switch Ports
195	O-11 FOC & Reject Completeness Fully Mechanized UNE Combo Other
196	O-11 FOC & Reject Completeness Fully Mechanized UNE Digital Loop ≥DS1
197	O-11 FOC & Reject Completeness Fully Mechanized UNE Digital Loop <ds1< th=""></ds1<>
198	O-11 FOC & Reject Completeness Fully Mechanized UNE ISDN
199	O-11 FOC & Reject Completeness Fully Mechanized UNE Loop • Port Combos
200	O-11 FOC & Reject Completeness Fully Mechanized UNE Other Design
201	O-11 FOC & Reject Completeness Fully Mechanized UNE xDSL (ADSL, HDSL, UC)
202	O-11 FOC & Reject Completeness Non Mechanized 2W Analog Loop Design
203	O-11 FOC & Reject Completeness Non Mechanized 2W Analog Loop w/LNP Design
204	O-11 FOC & Reject Completeness Non Mechanized 2W Amalog Loop w/LNP Non Design
205	O-11 FOC & Reject Completeness Non Mechanized 2W Analog Loop Non Design
206	O-11 FOC & Reject Completeness Non Mechanized Resale Business
207	O-11 FOC & Reject Completeness Non Mechanized Resale Centrex
208	O-11 FOC & Reject Completeness Non Mechanized Resale Design (Special)
209	O-11 FOC & Reject Completeness Non Mechanized EEL's
210	O-11 FOC & Reject Completeness Non Mechanized Resale ISDN
211	O-11 FOC & Reject Completeness Non Mechanized Line Splitting
212	O-11 FOC & Reject Completeness Non Mechanized Local Interoffice Transport
213	O-11 FOC & Reject Completeness Non Mechanized Local Interconnection Trunks
214	O-11 FOC & Reject Completeness Non Mechanized LNP Standalone
215	O-11 FOC & Reject Completeness Non Mechanized Line Sharing
216	O-11 FOC & Reject Completeness Non Mechanized Resale PBX
217	O-11 FOC & Reject Completeness Non Mechanized Resale Residence
218	O-11 FOC & Reject Completeness Non Mechanized Switch Ports
219	O-11 FOC & Reject Completeness Non Mechanized UNE Combo Other





SEEM Submetrics

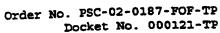
Item No.	Tier 2 Sub Metrics
220	O-11 FOC & Reject Completeness Non Mechanized UNE Digital Loop ≥DS1
221	100 mm 21 mm 21 mm 20 mm
222	O-11 FOC & Reject Completeness Non Mechanized UNE ISDN
223	O-11 FOC & Reject Completeness Non Mechanized UNE Loop + Port Combos
224	O-11 FOC & Reject Completeness Non Mechanized UNE Other Design
225	O-11 FOC & Reject Completeness Fully Mechanized UNE Other Non Design
226	O-11 FOC & Reject Completeness Non Mechanized UNE Other Non Design
227	O-11 FOC & Reject Completeness Non Mechanized UNE xDSL (ADSL, HDSL, UC)
228	O-11 FOC & Reject Completeness Partially Mechanized 2W Analog Loop Design
229	O-11 FOC & Reject Completeness Partially Mechanized 2W Analog Loop w/LNP Design
230	O-11 FOC & Reject Completeness Partially Mechanized 2W Analog Loop w/LNP Non Design
231	O-11 FOC & Reject Completeness Partially Mechanized 2W Analog Loop Non Design
232	O-11 FOC & Reject Completeness Partially Mechanized Resale Business
233	O-11 FOC & Reject Completeness Partially Mechanized Resale Centrex
234	O-11 FOC & Reject Completeness Partially Mechanized Resale Design (Special)
235	O-11 FOC & Reject Completeness Partially Mechanized EEL's
236	O-11 FOC & Reject Completeness Partially Mechanized Resale ISDN
237	O-11 FOC & Reject Completeness Partially Mechanized Line Splitting
238	O-11 FOC & Reject Completeness Partially Mechanized Local Interoffice Transport
239	O-11 FOC & Reject Completeness Partially Mechanized Local Interconnection Trunks
240	O-11 FOC & Reject Completeness Partially Mechanized LNP Standalone
241	
242	O-11 FOC & Reject Completeness Partially Mechanized Resale PBX
243	0-11 FOC & Reject Completeness Partially Mechanized Resale Residence
244	
245	
246	O-11 FOC & Reject Completeness Partially Mechanized UNE Digital Loop ≥DS1
247	
248	O-11 FOC & Reject Completeness Partially Mechanized UNE ISDN
249	O-11 FOC & Reject Completeness Partially Mechanized UNE Loop + Port Combos
250	O-11 FOC & Reject Completeness Partially Mechanized UNE Other Design
251	
252	
253	
254	
255	
256	0-1 Acknowledgement Message Timeliness (Electronically) - TAG





SEEM Submetrics

Item No.	Tier 2 Sub Metrics
	O-2 Acknowledgement Message Completeness - EDI Fully Mechanized
257	O-2 Acknowledgement Message Completeness - TAG Fully Mechanized
258	O-2 Acknowledgement Message Completedess 1733 Lary Message 1733 Lar
259	O-3 Percent flow-through Service Requests (Summary) - Total LNP
260	O-3 Percent flow-through Service Requests (Summary) - Total Residence
261	
262	O-3 Percent flow-through Service Requests (Summary) - Total UNE
263	O-8 Reject Interval Fully Mechanized 2W Analog Loop Design
264	O-8 Reject Interval Fully Mechanized 2W Analog Loop w/LNP Design
265	O-8 Reject Interval Fully Mechanized 2W Analog Loop w/LNP Non Design
266	O-8 Reject Interval Fully Mechanized 2W Analog Loop Non Design
267	O-8 Reject Interval Fully Mechanized Resale Business
268	O-8 Reject Interval Fully Mechanized Resale Centrex
269	O-8 Reject Interval Fully Mechanized Resale Design (Special)
270	O-8 Reject Interval Fully Mechanized EEL's
271	O-8 Reject Interval Fully Mechanized Resale ISDN
272	O-8 Reject Interval Fully Mechanized Line Splitting
273	O-8 Reject Interval Fully Mechanized Local Interoffice Transport
274	O-8 Reject Interval Fully Mechanized Local Interconnection Trunks
275	O-8 Reject Interval Fully Mechanized LNP Standalone
276	O-8 Reject Interval Fully Mechanized Line Sharing O-8 Reject Interval Fully Mechanized Resale PBX
277	O-8 Reject Interval Fully Mechanized Residence
	O-8 Reject Interval Fully Mechanized Switch Ports
279	O-8 Reject Interval Fully Mechanized UNE COMBO Other
280	O-8 Reject Interval Fully Mechanized UNE Digital Loop >DS1
281	O-8 Reject Interval Fully Mechanized UNE Digital Loop < DS1
282	12 th Mr. Ar Assigned (DATE (STA)
283	17 11 North and 17 DE Loop & Post Combos
284	17 11 14 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
285	17. 11. Markey and I TAUC Other Non Design
287	TO THE PROPERTY OF THE PROPERT
	The state of the s
288	1 No Mariand 2W Applea Loop pull NP Design
289	A STATE OF THE PROPERTY OF THE
290	1 No. Marketined 2 W. Applied Loop Non Design
291	156 Afrahaminal Basela Basiness
292	136 24 sharined Decelor Control
293	U-5 Keject theres i full Mechanized Touris

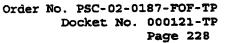




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SEEM Submetrics

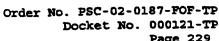
Item No.	Tier 2 Sub Metrics
294	O-8 Reject Interval Non Mechanized Resale Design (Special)
295	O-8 Reject Interval Non Mechanized EEL's
296	O-8 Reject Interval Non Mechanized Resale ISDN
297	O-8 Reject Interval Non Mechanized Line Splitting
298	O-8 Reject Interval Non Mechanized Local Interoffice Transport
299	O-8 Reject Interval Non Mechanized Local Interconnection Trunks
300	O-8 Reject Interval Non Mechanized LNP Standalone
301	O-8 Reject Interval Non Mechanized Line Sharing
302	O-8 Reject Interval Non Mechanized Resale PBX
303	O-8 Reject Interval Non Mechanized Resale Residence
304	O-8 Reject Interval Non Mechanized Switch Ports
305	O-8 Reject Interval Non Mechanized UNE COMBO Other
306	O-8 Reject Interval Non Mechanized UNE Digital Loop ≥ DS1
307	O-8 Reject Interval Non Mechanized UNE Digital Loop <ds1< td=""></ds1<>
308	O-8 Reject Interval Non Mechanized UNE ISDN
309	O-8 Reject Imerval Non Mechanized UNE Loop + Port Combos
310	127 Markening LINE Other Design
311	O-8 Reject Interval Non Mechanized UNE Other Non Design
312	ADSI HDSL UC)
313	O-8 Reject Interval Partially Mechanized 2W Analog Loop Design
314	O-8 Reject Interval Partially Mechanized 2W Analog Loop w/LNP Design
315	O-8 Reject Interval Partially Mechanized 2W Analog Loop w/LNP Non Design
316	Analog Loop Non Design
317	O-8 Reject Interval Partially Mechanized Resale Business
318	
319	
320	
32	
32	O-8 Reject Interval Partially Mechanized Line Splitting
32	O-8 Reject Interval Partially Mechanized Local Interoffice Transport
32	
32	
32	
32	7 O-8 Reject Interval Partially Mechanized Resale PBX
32	8 O-8 Reject Interval Partially Mechanized Resale Residence
32	9 O-8 Reject Interval Partially Mechanized Switch Ports
33	0 O-8 Reject Interval Partially Mechanized UNE COMBO Other





SEEM Submetrics

Item No.	Tier 2 Sub Metrics
ļ	
331	O-8 Reject Interval Partially Mechanized UNE Digital Loop ≥DS1
332	O-8 Reject Interval Partially Mechanized UNE Digital Loop <ds1< td=""></ds1<>
333	O-8 Reject Interval Partially Mechanized UNE ISDN
334	O-8 Reject Imerval Partially Mechanized UNE Loop + Port Combos
335	O-8 Reject Interval Partially Mechanized UNE Other Design
336	O-8 Reject Interval Partially Mechanized UNE Other Non Design
337	O-8 Reject Interval Partially Mechanized UNE xDSL (ADSL, HDSL, UC)
338	O-9 Firm Order Confirmation Timeliness Fully Mechanized 2W Analog Loop Design
339	O-9 Firm Order Confirmation Timeliness Fully Mechanized 2W Analog Loop w/LNP Design
340	O-9 Firm Order Confirmation Timeliness Fully Mechanized 2W Analog Loop w/LNP Non Design
341	O-9 Firm Order Confirmation Timeliness Fully Mechanized 2W Analog Loop Non Design
342	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale Business
343	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale Centrex
344	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale Design (Special)
345	O-9 Firm Order Confirmation Timeliness Fully Mechanized EEL's
346	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale ISDN
347	O-9 Firm Order Confirmation Timeliness Pully Mechanized Line Splitting
348	O-9 Firm Order Confirmation Timeliness Fully Mechanized Local Interoffice Transport
349	O-9 Firm Order Confirmation Timeliness Fully Mechanized Local Interconnection Trunks
350	O-9 Firm Order Confirmation Timeliness Fully Mechanized LNP Standalone
351	O-9 Firm Order Confirmation Timeliness Fully Mechanized Line Sharing
352	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale PBX
353	O-9 Firm Order Confirmation Timeliness Fully Mechanized Resale Residence
354	O-9 Firm Order Confirmation Timeliness Fully Mechanized Switch Ports
355	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE Combo Other
356	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE Digital Loop ≥DS1
357	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE Digital Loop <ds1< td=""></ds1<>
358	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE ISDN
359	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE Loop + Port Combos
360	O-9 Firm Order Confirmation Timeliness Pully Mechanized UNE Other Design
361	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE xDSL (ADSL, HDSL, UC)
362	O-9 Firm Order Confirmation Timeliness Non Mechanized 2W Analog Loop Design
363	O-9 Firm Order Confirmation Timeliness Non Mechanized 2W Analog Loop w/LNP Design
364	O-9 Firm Order Confirmation Timeliness Non Mechanized 2W Analog Loop w/LNP Non Design
365	O-9 Firm Order Confirmation Timeliness Non Mechanized 2W Analog Loop Non Design
366	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale Business
367	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale Centrex
<u> </u>	



SEEM Submetrics



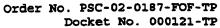
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Table B-2: Tier 2 Submetrics (Continued)	
Item No.	Tier 2 Sub Metrics
368	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale Design (Special)
369	O-9 Firm Order Confirmation Timeliness Non Mechanized EEL's
370	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale ISDN
371	O-9 Firm Order Confirmation Timeliness Non Mechanized Line Splitting
372	O-9 Firm Order Confirmation Timeliness Non Mechanized Local Interoffice Transport
373	O-9 Firm Order Confirmation Timeliness Non Mechanized Local Interconnection Trunks
374	O-9 Firm Order Confirmation Timeliness Non Mechanized LNP Standalone
375	O-9 Firm Order Confirmation Timeliness Non Mechanized Line Sharing
376	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale PBX
377	O-9 Firm Order Confirmation Timeliness Non Mechanized Resale Residence
378	O-9 Firm Order Confirmation Timeliness Non Mechanized Switch Ports
379	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE Combo Other
380	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE Digital Loop ≥DS1
381	O-9 Firm Order Confurmation Timeliness Non Mechanized UNE Digital Loop <ds1< td=""></ds1<>
382	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE ISDN
383	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE Loop + Port Combos
384	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE Other Design
385	O-9 Firm Order Confirmation Timeliness Fully Mechanized UNE Other Non Design
386	
387	O-9 Firm Order Confirmation Timeliness Non Mechanized UNE xDSL (ADSL, HDSL, UC)
388	O-9 Firm Order Confirmation Timeliness Partially Mechanized 2W Analog Loop Design
389	O-9 Firm Order Confirmation Timeliness Partially Mechanized 2W Analog Loop w/LNP Design
390	
391	O-9 Firm Order Confirmation Timeliness Partially Mechamzed 2W Analog Loop Non Design
392	O-9 Firm Order Confirmation Timeliness Partially Mechanized Resale Business
393	
394	O-9 Firm Order Confirmation Timeliness Partially Mechanized Resale Design (Special)
395	O-9 Firm Order Confirmation Timeliness Partially Mechanized EEL's
396	O-9 Firm Order Confirmation Timeliness Partially Mechanized Resale ISDN
397	O-9 Firm Order Confirmation Timeliness Partially Mechanized Line Splitting
398	
399	O-9 Firm Order Confirmation Timeliness Partially Mechanized Local Interconnection Trunks
400	O-9 Firm Order Confirmation Timeliness Partially Mechanized LNP Standalone
401	
402	
403	
404	O-9 Firm Order Confirmation Timeliness Partially Mechanized Switch Ports



SEEM Submetrics

Item No.	Tier 2 Sub Metrics
405	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Combo Other
406	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Digital Loop ≥DS1
407	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Digital Loop <ds1< td=""></ds1<>
408	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE ISDN
409	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Loop + Port Combos
410	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Other Design
411	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE Other Non Design
412	O-9 Firm Order Confirmation Timeliness Partially Mechanized UNE xDSL (ADSL, HDSL, UC)
413	A DARTHY : 2 CECT THE ATT AS
414	I DA DETTY : 2 CECY TO IC DO A D
415	OSS-1 Average Response Time and Response Interval, BST performance in OASISBIG compared to CLEC performance in PSIMS/ORB (includes COFFI/USOC), PARITY ÷ 2 SEC LENS
416	OSS-1 Average Response Time and Response Interval, BST performance in OASISBIG compared to CLEC performance in PSIMS/ORB (includes COFFI/USOC). PARITY + 2 SEC TAG
417	
418	OSS-1 Average Response Time and Response Imerval PARITY + 2 SEC LENS RSAG-TN
419	OSS-1 Average Response Time and Response Interval PARITY ÷ 2 SEC TAG ATLAS
420	OSS-1 Average Response Time and Response Interval PARITY + 2 SEC LENS CRIS-CRESCSRL
421	OSS-1 Average Response Time and Response Interval PARITY + 2 SEC TAG CRIS-TAG-CSR
422	OSS-1 Average Response Time and Response Interval PARITY + 2 SEC TAG DSAP
423	OSS-1 Average Response Time and Response Interval PARITY + 2 SEC TAG RSAG-ADDR
424	OSS-1 Average Response Time and Response Interval PARITY + 2 SEC TAG RSAG-TN
425	OSS-2 Interface Availability (Pre-Ordering) EDI
426	OSS-2 Interface Availability (Pre-Ordering) HAL
427	OSS-2 Interface Availability (Pre-Ordering) LENS
428	OSS-2 Interface Availability (Pre-Ordering) LEO MAINFRAME
429	OSS-2 Interface Availability (Pre-Ordering) LESOG
430	OSS-2 Interface Availability (Pre-Ordering) PSIMS
431	OSS-2 Interface Availability (Pre-Ordering) TAG
432	OSS-3 Interface Availability (Maintenance and Repair) ALEC ECTA
433	OSS-3 Interface Availability (Maintenance and Repair) ALEC TAFI
434	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-CRIS)
435	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-DLETH)
436	OSS-4 Response Interval (Maintenance and Repair) OSS-4-DLR)
437	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-LMOS)
438	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-LMOSupd)

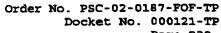




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SEEM Submetrics

Item No.	Tier 2 Sub Metrics
439	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-LNP)
440	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-MARCH)
440	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-NIW)
442	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-OSPCM)
443	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-Predictor)
444	OSS-4 Response Interval (Maintenance and Repair) (OSS-4-SOCS)
445	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop Design
446	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
447	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
448	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
449	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop w/INP Non Design
450	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - 2 w Analog Loop Non-Design
451	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Resale Business
452	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Resale Centrex
453	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Resale Design
454	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 Resale ISDN DESIGN
455	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 Resale ISDN NON DESIGN
456	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Local Transport
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Local Interconnection Trunks
458	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - LNP Standalone
459	Resale PBX
460	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - Resale Residence
461	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Combo Other
462	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Digital Loop ≥ DS1

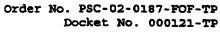


SEEM Submetrics



Florida Plan

	Table B-2: Tier 2 Submetrics (Continued)	
item No.	Tier 2 Sub Metrics	
463	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Digital Loop < DS1	
464	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Dispatch - EEL's	
465	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE ISDN (includes UDC)	
466	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Line Sharing	
467	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Dispatch - UNE Line Splitting	
468	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Dispatch - UNE Other Design	
469	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - ≥ 10 Dispatch - UNE Other Non Design	
470	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥ 10 - UNE Switch ports	
. 471	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch ≥10 - UNE xDSL (ADSL, HDSL, UCL)	
472	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch in ≥ 10 - UNE Loop and Port Combo	
473	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch In < 10 - UNE Loop and Port Combo	
474	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop Design	
475	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/LNP Design	
476	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/LNP Non Design	
477	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/INP Design	
478	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop w/INP Non Design	
479	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - 2 w Analog Loop Non-Design	
480	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Business	
481	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Centrex	
482	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Design	
483	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 Resale ISDN	

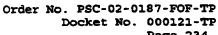




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SEEM Submetrics

Item No.	Tier 2 Submetrics (Continued)
484	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Local Transport
485	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch - Local Interconnection Trunks
486	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - LNP Standalone
487	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale PBX
488	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - Resale Residence
489	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Combo Other
490	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Digital Loop ≥ DSI
491	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Digital Loop < DS1
492	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - EEL's
493	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE ISDN (includes UDC)
494	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Line Sharing
495	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Line Splitting
496	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Other Design
497	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Dispatch - UNE Other Non Design
4ÿ8	P 3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch < 10 - UNE Switch ports
499	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
500	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch out ≥ 10 - UNE Loop and Port Combo
501	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Dispatch Out < 10 - UNE Loop and Port Combo
502	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop Design
503	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
504	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design

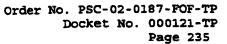




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SEEM Submetrics

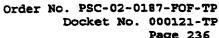
Item No.	Tier 2 Sub Metrics
505	10 - 2 w Analog Loop w/INP Design
506	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop w/INP Non Design
507	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - 2 w Analog Loop Non-Design
508	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale Business
509	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale Centrex
510	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale Design
511	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale ISDN
512	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - Local Transport
513	Local Interconnection Trunks
514	P-3A Percent Missed Installation Appointments Including Subsequent Appointments - Non Dispatch ≥ 10 - LNP Standalone
515	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - Resale PBX
516	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 Resale Residence
517	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - UNE Combo Other
518	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Non Dispatch - EEL's
519	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch 2 10 - UNE ISDN (includes UDC)
520	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non-Dispatch ≥ 10 - UNE Loop and Port Combo
521	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - UNE Line Sharing
522	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Non Dispatch - UNE Line Splitting
523	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 UNE Digital Loop ≥ DS1
524	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - UNE Digital Loop < DS1
525	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Non Dispatch - UNE Other Design





SEEM Submetrics

item No.	Tier 2 Sub Metrics
526	P-3A Percent Missed Installation Appointments Including Subsequent Appointments ≥ 10 Non Dispatch - UNE Other Non Design
527	10 - UNE Switch parts
528	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch ≥ 10 - UNE xDSL (ADSL, HDSL, UCL)
529	10 - 2 w Analog Loop Design
530	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - 2 w Analog Loop w/LNP Design
531	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - 2 w Analog Loop w/LNP Non Design
532	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - 2 w Analog Loop w/INP Design
533	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - 2 w Analog Loop w/INP Non Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - 2 w Analog Loop Non-Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - Resale Business
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - Resale Centrex
537	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - Resale Design
538	10 Resale ISDN
539	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - Local Transport
540	Local Interconnection Trunks
541	10 - LNP Standalone
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - Resale PBX
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 Resale Residence
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE Combo Other
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Non Dispatch - EEL's
546	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE ISDN (includes UDC)



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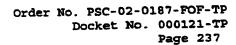
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SEEM Submetrics

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Tier 2 Sub Metrics
547	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE Loop and Port Combo
548	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE Line Sharing
549	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Non Dispatch - UNE Line Splitting
550	10 UNE Digital Loop ≥ DS1
551	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE Digital Loop < DS1
552	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Non Dispatch - UNE Other Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments < 10 Non Dispatch - UNE Other Non Design
	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch < 10 - UNE Switch ports
ĺ	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
ļ	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Switch-based ≥ 10 - UNE Loop and Port Combo
1	P-3A Percent Missed Installation Appointments Including Subsequent Appointments Switch-based < 10 - UNE Loop and Port Combo
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
1	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/INP Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop w/INP Non Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - 2 w Analog Loop Non-Design
564	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Business
565	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Centrex
566	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale Design
567	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - Resale ISDN

Updated January 30, 2002



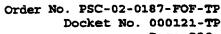


SEEM Submetrics

ltem No.	Tier 2 Sub Metrics
568	10 - Local Transport
569	Local interconnection Trunks
570	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - LNP Standalone
571	10 - Resale PBX
572	10 - Resale Residence
573	10 - UNE Combo Other
574	10 - UNE Digital Loop ≥ DSI
575	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥ 10 - UNE Digital Loop < DS1
576	10 - EEL's
577	10 - UNE ISDN (includes UDC)
578	10 - UNE Line Sharing
579	10 - UNE Line Splitting
580	10 - UNE Other Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch 10 - UNE Other Non Design
582	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch
583	>10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch ≥10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch > 10 - UNE Loop and Port Combo
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch
587	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch
588	Completion Notice Interval (AOCCNI) Distribution Dispatch

SEEM Submetrics

Item No.	Tier 2 Sub Metrics
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch <
	10 - 2 w Analog Loop w/LNP Non Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop w/INP Design
,	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop w/INP Non Design
592	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - 2 w Analog Loop Non-Design
593	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Business
594	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Centrex
595	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Design
596	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 Resale ISDN
597	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Local Transport
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch - Local Interconnection Trunks
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - LNP Standalone
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale PBX
1	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - Resale Residence
1	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Combo Other
ĺ	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Digital Loop ≥ DS1
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Digital Loop < DS1
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - EEL's
606	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE ISDN (includes UDC)
607	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Line Sharing
608	10 - UNE Line Splitting
609	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Other Design



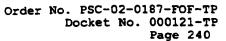
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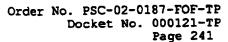
item No.	Tier 2 Sub Metrics
610	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Other Non Design
611	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch < 10 - UNE Switch ports
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
613	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
614	P-4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Dispatch out ≥ 10 - UNE Loop and Port Combo
615	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Dispatch out < 10 - UNE Loop and Port Combo
616	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop Design
617	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
618	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non Design
619	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - 2 w Analog Loop Non-Design
620	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Business
621	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Centrex
622	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Design
623	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 Resale ISDN
624	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Discribution Non Dispatch ≥ 10 - Local Transport
625	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Local Interconnection Trunks
626	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - LNP Standalone
627	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale PBX
628	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - Resale Residence
629	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Combo Other
630	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - EEL's





SEEM Submetrics

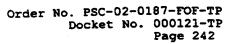
Item No.	Tier 2 Sub Metrics
631	patch ≥ 10 - UNE ISDN (includes UDC)
632	perch ≥ 10 - UNE Loop and Port Combo
633	patch ≥ 10 - UNE Line Sharing
634	patch ≥ 10 - UNE Line Splitting
635	patch ≥ 10 UNE Digital Loop ≥ DS1
636	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Digital Loop < DS1
637	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Other Design
638	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch ≥ 10 - UNE Other Non Design
639	patch ≥ 10 - UNE Switch ports
640	patch ≥10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
641	patch ≥10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
642	P-4A Average Order Completion and Completion Notice Interval (AOCCN1) Distribution Non Dispatch < 10 - 2 w Analog Loop Design
643	patch < 10 - 2 w Analog Loop Non-Design
1	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - 2 w Analog Loop w/LNP Design
}	P-4A Average Order Completion and Completion Notice Leterval (AOCCNI) Distribution Non Dispatch < 10 - 2 w Analog Loop w/LNP Non Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - 2 w Analog Loop w/INP Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - 2 w Analog Loop w/INP Non Design
648	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - Resale Business
649	patch < 10 - Resale Centrex
650	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - Resale Design
651	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 Resale ISDN





SEEM Submetrics

Item No.	Tier 2 Sub Metrics
652	patch < 10 - Local Transport
653	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch - Local Interconnection Trunks
654	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - LNP Standalone
655	patch < 10 - Resale PBX
656	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - Resale Residence
657	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Disperch < 10 - UNE Combo Other
658	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - EEL's
659	patch < 10 - UNE ISDN (includes UDC)
660	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non-Dispatch < 10 - UNE Loop and Port Combo
661	patch < 10 - UNE Line Sharing
662	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Line Splitting
663	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Digital Loop ≥ DS1
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Digital Loop < DS1
665	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Other Design
1	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Other Non Design
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch < 10 - UNE Switch ports
	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) with conditioning
669	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Non Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL) w/o conditioning
670	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Switch-based ≥ 10 - UNE Loop and Port Combo
671	P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution Switch-based < 10 - UNE Loop and Port Combo
672	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL1 IDLC

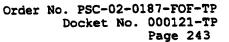


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SEEM Submetrics

Item No.	Tier 2 Sub Metrics
	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL1 Non Time Specific
674	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL 1 Time Specific
675	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 IDLC
676	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 Time Non Specific
677	P-7A Coordinated Customer Conversions Hot Cuts Timeliness % within Interval and Average Interval SL2 Time Specific
678	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/m 7 days of a completed Service Order - UNE Loops Design - Dispatch
679	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Design - Non Dispatch
680	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Non Design - Dispatch
681	P-7C Coordinated Customer Conversions - % Provisioning Troubles Rec w/in 7 days of a completed Service Order - UNE Loops Non Design - Non Dispatch
682	P-7 Coordinated Customer Conversions Internal - Unbundles Loops with INP
683	P-7 Coordinated Customer Conversions Internal - Unbundles Loops with LNP
684	P-8 Cooperative Acceptance Testing - % of xDSL Loc ADSL
685	P-8 Cooperative Acceptance Testing - % of xDSL Loc HDSL
686	P-8 Cooperative Acceptance Testing - % of xDSL Loc Other
687	P-8 Cooperative Acceptance Testing - % of xDSL Loc UNE UCL
688	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog Loop Design
689	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analog W/LNP Design
690	Loop w/LNP Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - 2 w Analo Loop Non-Design
692	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Resale Busness
693	trex
694	Design
695	DESIGN
696	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 Resale ISDN NON DESIGN



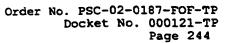


SEEM Submetrics

Table B-2: Tier 2 Submetrics (Continued)

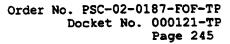
Item No.	Tier 2 Sub Metrics
697	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Local Transport
698	nection Trunks
699	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 LNP Standalone
700	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - Resale PBX
701	dence
702	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Combo Other
703	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Digital Loop ≥ DS1
704	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Digital Loop < DS1
705	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - EEL's
706	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE ISDN (includes UDC)
707	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Line Sharing
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Line Splitting
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Other Design
710	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Other Non Design
711	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch ≥ 10 - UNE Switch ports
712	(ADSL, HDSL, UCL)
713	and Port Combo
714	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch in < 10 - UNE Loop and Port Combo
715	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop Design
716	Loop w/LNP Design
717	Loop w/LNP Non-Design
718	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - 2 w Analog Loop Non-Design

7 L.



SEEM Submetrics

Item No.	Tier 2 Sub Metrics
719	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Business
720	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale Centerx
721	Design
722	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - Resale ISDN
723	port
724	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch - Local Interconnection Trunks
725	lone
726	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Dispatch < 10 - Resale PBX
727	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 Resale Residence
728	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Combo Other
<u> </u>	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Digital Loop ≥ DS1
730	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Digital Loop < DS1
731	
732	(includes UDC)
733	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Line Sharing
734	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch < 10 - UNE Line Splitting
735	Design
736	Non Design
737	ports
738	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch <10 - UNE xDSL (ADSL, HDSL, UCL)
739	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch out ≥ 10 - UNE Loop and Port Combo
740	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Dispatch out < 10 - UNE Loop and Port Combo

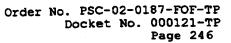






SEEM Submetrics

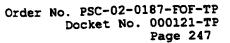
item No.	Tier 2 Sub Metrics
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Design
-	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - 2 w Analog Loop w/LNP Non-Design
1	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 ~ 2 w Analog Loop Non-Design
1	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Business
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Centrex
	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 Resale ISDN DESIGN
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 Resale ISDN NON DESIGN
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Local Transport
751	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Local Inter- connection Trunks
752	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch ≥ 10 LNP Standalone
753	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - Resale PBX
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 Resale Residence
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Combo Other
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - EEL's
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE ISDN (includes UDC)
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch ≥ 10 - UNE Loop and Port Combo
759	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Line Sharing
760	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Line Splitting
761	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch \geq 10 UNE Digital Loop \geq DS1
762	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Digital Loop < DS1





SEEM Submetrics

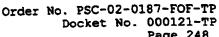
Item No.	Tier 2 Sub Metrics
İ	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Other Design
- 1	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Other Non Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE Switch ports
766	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch ≥ 10 - UNE xDSL (ADSL, HDSL, UCL)
767	Analog Loop Design
768	Analog Loop w/LNP Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - 2 w Analog Loop w/LNP Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - 2 w Analog Loop Non-Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resale Business
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resalt Centrex
	P-9 % Provisioning Troubles w/m 30 days of Service Order Completion Non Dispatch < 10 - Resale Design
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 Resale ISDN
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Local Transport
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch - Local Inter- connection Trunks
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - LNP Standalone
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - Resalt PBX
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 Resale Residence
780	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Combo Other
781	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - EEL
782	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE ISDN (includes UDC)
783	Loop and Port Combo
784	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Line Sharing





SEEM Submetrics

Item No.	Tier 2 Sub Metrics
785	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Line Splitting
786	ital Loop ≥ DS1
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Digital Loop < DS1
788	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Other Design
789	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE Other Non Design
790	Switch ports
	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Non Dispatch < 10 - UNE xDSL (ADSL, HDSL, UCL)
792	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Switch-based ≥ 10 - UNE Loop and Port Combo
793	P-9 % Provisioning Troubles w/in 30 days of Service Order Completion Switch-based < 10 - UNE Loop and Port Combo
794	P-11 Service Order Accuracy - Resale
795	P-11 Service Order Accuracy - UNE
796	P-11 Service Order Accuracy - UNE - P
797	PO-1 Loop Makeup - Average Response Time - Manual
798	PO-2 Loop Makeup - Average Response Time - Electronic
799	TGP-1 Trunk Group Performance Aggregate



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Statistical Properties and Definitions

Appendix C: Statistical Properties and Definitions

The statistical process for testing whether BellSouth's (BST) wholesale customers (alternative local exchange carriers or ALECs) are being treated equally with BST's retail customers involves more than a simple mathematical formula. Three key elements need to be considered before an appropriate decision process can be developed. These are the type of:

- data
- companison
- performance

This appendix describes the properties of a test methodology and the truncated Z statistic for four types of measures.

Necessary Properties for a Test Methodology 1.

Once the key elements are determined, a test methodology should be developed that complies with the following properties:

- Like-to-Like Comparisons
- Aggregate Level Test Statistic
- Production Mode Process
- Balancing
- Trimming

Like-to-Like Comparisons

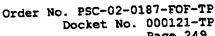
When possible, data should be compared at appropriate levels, e.g. wire center, time of month, dispatched residential, new orders. The testing process should:

- Identify variables that may affect the performance measure
- Record these important confounding covariates
- Adjust for the observed covariates in order to remove potential biases and to make the ALEC and the ILEC units as comparable as possible

Aggregate Level Test Statistic

Each performance measure of interest should be summarized by one overall test statistic giving the decision make a rule that determines whether a statistically significant difference exists. The test statistic should have the following properties:

- The method should provide a single overall index on a standard scale.
- If entries in comparison cells are exactly proportional over a covariate, the aggregated index should be very nearly the same as if comparisons on the covariate had not been done.
- The contribution of each comparison cell should depend on the number of observations in the cell.
- Cancellation between comparison cells should be limited.
- The index should be a continuous function of the observations.



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Statistical Properties and Definitions

Production Mode Process

The decision system must be developed so that it does not require intermediate manual intervention, i.e., the process must be mechanized to the extent possible.

- Calculations are well defined for possible eventualities.
- The decision process is an algorithm that needs no manual intervention.
- Results should be arrived at in a timely manner.
- The system must recognize that resources are needed for other performance measure-related processes that also must be run in a timely manner.
- The system should be auditable, and adjustable over time.

Balancing

The testing methodology should balance Type I and Type II Error probabilities.

- P (Type I Error) = P (Type II Error) for well-defined mill and alternative hypotheses.
- The formula for a test's balancing critical value should be simple enough to calculate using standard mathematical functions. i.e., one should avoid methods that require computationally intensive techniques.
- Little to no information beyond the null hypothesis, the alternative hypothesis, and the number of observations should be required for calculating the balancing critical value.

Trimmina

Trimming of extreme observations from BellSouth and ALEC distributions is needed in order to ensure that a fair comparison is made between performance measures. Three conditions are needed to accomplish this goal. These conditions are:

- Trimming should be based on a general rule that can be used in a production setting.
- Trimmed observations should not simply be discarded; they need to be examined and possibly used in the final decision-making process.
- Trimming should only be used on performance measures that are sensitive to "outliers."

Measurement Types

The performance measurements that will undergo testing are of four types: mean, ratio, proportion, and rate. All four have similar characteristics. Different types of data are used to calculate them. Table C-1 shows the type of data that is used to derive each measurement type.

Table C-1: Measurements Types and Data

Measurement Type	Data Used to Derive Measure	
Mean	Interval measurements	
Ratio		
Proportion	Counts	
Rate		

Attachment A

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Statistical Properties and Definitions

2. Testing Methodology - The Truncated Z

The calculation of the Truncated Z statistic is described in Appendix A of the "Louisiana Statistician's Report." The methodology described in this document is the same as that described in the "Statistician's Report;" however, this document contains extra technical details to avoid undefined situations when programming the technique.

In summary, many covariates are chosen in order to provide meaningful comparison levels below the submetric level chosen for the parity comparison. This includes such factors as wire center and time of month, as well as order type for provisioning measures. In each comparison cell, a Z statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal, with mean zero and variance equal to one. Assuming that the test statistic is derived so that it is negative when the performance for the ALEC is worse than for the ILEC, a positive truncation is done—i.e. if the result is negative it is left alone, if the result is positive it is changed to zero. A weighted sum of the truncated statistics is calculated where a cell's weight depends on the volume of BST and ALEC orders in the cell. The weighted sum is standardized by the subtracting theoretical mean of the truncated distribution, and this is divided by the standard error of the weighted sum. Summaries based on measurement type are given for the calculation of the cell Z statistic.

Mean Measures

For mean measures, an adjusted, asymmetric t statistic is calculated for each like-to-like cell that has at least seven BST and seven ALEC transactions. This statistic is an adjustment to the modified z statistic in order to make the assumption that the statistic is approximately normally distributed more reasonable even for fairly small sample sizes. The adjusted, asymmetric t statistic is part of the methodology described in the "Statistician's Report," and it has been documented for the statistical community in the August 2001 issue of The American Statistician, a peer review statistics journal. The statistic was created for mean performance measure parity tests in order to reduce the number of permutation tests needed for calculating cell statistics. Several sets of BST/CLEC mean measure data from Louisiana were examined in order to determine when the adjustment results give approximately the same results as a permutation test. The result is that a permutation test is used when one or both of the BST and ALEC sample sizes is less than seven. The adjusted, asymmetric t statistic and the permutation calculation are described below.

Proportion Measures

For performance measures that are calculated as a proportion, in each adjustment cell, the cell Z and the moments for the truncated cell Z can be calculated in a direct manner. In adjustment cells where proportions are not close to zero or one, and where the sample sizes are reasonably large $(u_{ij}p_{ij}(1-p_{ij})>9)$, a normal approximation can be used. In this case, the moments for the truncated Z come directly from properties of the standard normal distribution. If the normal approximation is not appropriate, the hypergeometric distribution is the exact permutation distribution. In this case, the moments of the truncated Z are calculated exactly using the hypergeometric probabilities.

Rate Measures

The truncated Z methodology for rate measures has the same general structure for calculating the Z in each cell as proportion measures. For the rate measure customer trouble report rate there are a fixed number of access lines in service for the ALEC, b_{2j} , and a fixed number for BST, b_{1j} . The modeling assumption is that the occurrence of a trouble is independent between access lines, and the number of troubles in b access lines follows a Poisson distribution with mean λ_b where λ is the probability of a trouble per 1 access line and $b = b_{1j} + b_{2j}$ is the total number of access lines in service. The exact permutation distribution for this situation is the binomial distribution (the limit for the hypergeometric distribution) that is based on the total number of BST and ALEC troubles, n, and the proportion of BST access lines in service, $q_j = b_{1j}/b$

^{1.} Balkin, S. D. and Mallows, C. L. (2001), "An Adjusted, Asymmetric Two-Sample t Test," The American Statistician, 55, 203-206.



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Statistical Properties and Definitions

In an adjustment cell, if the number of ALEC troubles is greater than 15 and the number of BST troubles is greater than 15, and $n_{ij}q_{ij}(1-q_{ij}) > 9$, then a normal approximation can be used. In this case, the moments of the truncated Z come directly from properties of the standard normal distribution. Otherwise, if there are very few troubles, the number of ALEC troubles can be modeled using a binomial distribution with n equal to the total number of troubles (ALEC plus BST troubles.) in this case, the moments for the truncated Z are calculated explicitly using the binomial distribution.

Ratio Measures

The current plan contains no measures that call for the use of a Z parity statistic.



Statistical Formulas and Technical Descriptions

Appendix D: Statistical Formulas and Technical Descriptions

We start by assuming that any necessary trimming² of the data is complete, and that the data are disaggregated so that the comparison are made within appropriate classes or adjustment cells that define "like" observations.

This appendix contains information on the following:

- Notation and Exact Testing Distributions
- Calculating the Truncated Z
- Balancing Critical Value

1. Notation and Exact Testing Distributions

The basic notation for the construction of the truncated z statistic is detailed below. In these notations the word "cell" should be taken to mean a like-to-like comparison cell that has both of the following:

- one (or more) ILEC observations
- one (or more) ALEC observations

L = the total number of occupied cells

i = 1...L; and index for the cells

n_{1i} = the number of ILEC transactions in cell j

n_{2i} = the number of ALEC transactions in cell j

 n_i = the total number of transactions in cell j: $n_{1i} + n_{2i}$

 X_{1ik} individual ILEC transactions in cell j; $k = 1, ... n_{1i}$

 X_{2ik} individual ALEC transactions in cell j; $k = 1, ..., n_{2i}$

 $Y_{a} = individual transactions (both ILEC and ALEC) in cell j$

$$= \begin{cases} X_{1jk} & k = 1,...,n_{1,} \\ X_{2jk} & k = n_{1j} + 1,...,n_{j} \end{cases}$$

Φ⁻¹(.)-the inverse of the cumulative standard normal distribution function

In addition to this basic notation, additional notation is necessary for mean and ratio measures. This additional notation, and the notation needed for proportional and rate measures, is given in the following sections.

^{2.} When it is determined that a measure should be trimmed, trim the ILEC observations to the largest ALEC value from all ALEC observations in the month under consideration. That is, no ALEC values are removed; all ILEC observations greater than the largest ALEC observation are trimmed.



Statistical Formulas and Technical Descriptions

Additional Notation for Mean Measures

For mean performance measures, the following additional notation is needed.

$$\overline{X}_{ij}$$
 = the ALEC sample mean of cell j

$$S_{ij}^{2}$$
 = the ILEC sample variance in cell j

$$s_{2j}^2$$
 = the ALEC sample variance in cell j

$$\{Y_{ik}\}=$$
 a random sample of size n_{2j} from the set of $Y_{j1},\ldots,Y_{jn}; k=1,\ldots,n_{2j}$

M_i = The total number of distinct pairs of samples of size n_{1j} and n_{2j};

$$= \begin{pmatrix} \mathbf{n}_{\mathbf{j}} \\ \mathbf{n}_{\mathbf{j}} \end{pmatrix}$$

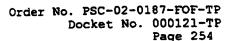
The exact parity test is the permutation test based on the "modified Z" statistic. For large samples, we can avoid permutation calculations since this statistic will be normal (or Student's t) to a good approximation. For small samples, where we cannot avoid permutation calculations, we have found that the difference between "modified Z" and the textbook "pooled Z" is negligible. We therefore propose to use the permutation test based on pooled Z for small samples. This decision speeds up the permutation computations considerably because for each permutation we need only compute the sum of the ALEC sample values, and not the pooled statistic itself.

A permutation probability mass function distribution for cell j, based on the "pooled Z' can be written as

$$PM(t) = P(\sum_{k} y_{jk} = t) = \frac{\text{the number of samples that sum to t}}{M_j}$$

and the corresponding cumulative permutation distribution is

$$CPM(t) = P(\sum_{k} y_{jk} \le t) = \frac{\text{the number of samples with sum } \le t}{M_{j}}$$





Statistical Formulas and Technical Descriptions

Notation for Proportion Measures

For proportion measures the following notation is defined.

a; = the number of ILEC cases possessing an attribute of interest in cell j'

azi = the number of ALEC cases possessing an attribute of interest in cell j

a; = the number of cases possessing an attribute of interest in cell j; a_{1j} + a_{2j}

The exact distribution for a parity test is the hypergeometric distribution. The hypergeometric probability mass function distribution for cell j is

$$HG(h) = P(H = h) = \begin{cases} \frac{\binom{n_{1j}}{h}\binom{n_{2j}}{a_j - h}}{\binom{n_1}{a_j}}, \max(0, a_j - n_{2j}) \le h \le \min(a_j, n_{1j}) \\ \binom{n_1}{a_j} & \text{otherwise} \end{cases}$$

and the cumulative hypergeometric distribution is

$$CHG(x) = P(H \le x) = \begin{cases} 0 & x < \max(0, a_i - n_{2i}) \\ \sum_{h=\max(0, a_j - n_{1i})}^{x} HG(h), & \max(0, a_j - n_{2j}) \le x \le \min(a_j, n_{1j}) \\ 1 & x > \min(a_j, n_{1j}) \end{cases}$$

Notation for Rate Measures

For rate measures, the notation needed is defined as:

b₁ = the number of ILEC base elements in cell j

b_{2i} = the number of ALEC base elements in cell j

 b_i = the total number of base elements in cell j: $b_{1j} + b_{2j}$

 \ddot{r}_{1j} = the ILED sample rate of cell j: $n_{1j} + b_{1j}$

 r_{2j} = the ILED sample rate of cell j; $n_{2j} \div b_{2j}$

 q_i = the relative proportion of ILEC elements for cell j; $b_{ij} \div b_j$



Statistical Formulas and Technical Descriptions

The exact distribution for a parity test is the binomial distribution. The binomial probability mass function distribution for cell j is:

$$BN(k) = P(B = k) = \begin{cases} \binom{n_j}{k} q_j^k (1 - q_j)^{n_j - k}, & 0 \le k \le n_j \\ 0 & \text{otherwise} \end{cases}$$

and the cumulative binomial distribution is

$$CBN(x) = P(B \le x) = \begin{cases} 0 & x < 0 \\ \sum_{k=0}^{n} BN(k), & 0 \le x \le n, \\ 1 & x > n, \end{cases}$$

Calculating the Truncated Z 2.

The general methodology for calculating an aggregate level test statistic is outlined below. More detailed instructions follow.

- Calculate Cell Weights (W;)
- Calculate Z_j
- Obtain a Truncated Z Value for Each Cell (Z*j)
- Calculate the Theoretical Mean and Variance of the Truncated Statistic Under the Null Hypothesis of Parity
- Calculate the Aggregate Test Statistic, Z^T

Calculate Cell Weights (Wi)

To calculate cell weights, W, a weight based on the number of transactions is used so that a cell, which has a larger number of transactions, has a larger weight. The actual weight formula depends on the type of measure. The formulas for each type of measure are given below.

Wi for Mean Measures

$$W_{_J} = \sqrt{\frac{n_{_{1J}}n_{_{2J}}}{n_{_J}}}$$

In the special case where all BST and ALEC values in a cell are identical, the weight must be reset to zero, that is $W_i = 0$. For more information, see "Calculate Z_i " on page 5.



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W_i for Proportion Measures

$$W_j = \sqrt{\frac{n_{2j}n_{1j}}{n_j} \cdot \frac{a_i}{n_j} \cdot \left(1 - \frac{a_j}{n_j}\right)}$$

Wi for Rate Measures

$$W_j = \sqrt{\frac{b_{1i}b_{2j}}{b_j} \cdot \frac{n_j}{b_j}}$$

Calculate Z_j

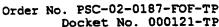
In each cell calculate a Z statistic. Zj. which has mean 0 and variance 1 under the null hypothesis. The formula for the test statistic depends on the type of measure.

Mean Measure

Use the conditions in the following table to determine the method for calculating Z_j . Details of each solution are given below.

Condition 1	Condition 2	Condition 3	Solution
****		$\overline{X}_{j_1} = \overline{X}_{s_2}^{\dagger}$	Set $Z_j = 0$ and reset $W_j = 0$.
$S_{ij}^2 = 0$	$s_{2_1}^2 = 0$	$\overline{X}_{ij} \neq \overline{X}_{ij}$	
	s ² ₂ ; > 0	NA	Permutation Test, See Solution 1
	$\min(n_{1j}, n_{2j}) \le 6$	NA	
$S_{1j}^2 > 0$	$\min(n_{1j}, n_{2j}) > 6$	NA	"f" Test, See Solution 2

[†] All values in the cell, from BellSouth and the ALEC, are the same.



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Solution 1: Permutation Test

The type of permutation test will depend on M_j , the total number of distinct pairs of samples of size n_{ij} and n_{2j} .

- $M_j \le 1000$, Perform an Exact Permutation Test a)
 - i) Calculate the sample sum for all possible samples of size n2i.
 - ii) Rank the sample sums from smallest to largest. Ties are dealt by using average ranks.
 - iii) Let R₀ be the rank of the observed sample sum with respect to all the sample sums.
 - iv) $\alpha = 1 \frac{R_4 0.5}{M_{\odot}}$
 - v) $Z_1 = \Phi^{-1}(\alpha)$
- M, > 1000. Perform a Random Permutation Test
 - i) Draw a random sample of 1,000 sample sums from the permutation distribution.
 - ii) Add the observed sample sum to the list. There is a total of 1001 sample sums.
 - iii) Rank the sample sums from smallest to largest. Ties are dealt by using average ranks.
 - vi) Let R₀ be the rank of the observed sample sum with respect to all the sample sums.
 - vii) $\alpha = 1 \frac{R_4 0.5}{1001}$
 - iv) $Z_i = \Phi^{-1}(\alpha)$

Solution 2: Adjusted Asymmetric "t" Test

- i) $t_1 = \frac{\overline{X}_{1_1} \overline{X}_{2_1}}{s_{1_1} \sqrt{\frac{1}{s_1} + \frac{1}{s_2}}}$ This is the "modified Z" statistic.
- ii) Find g. the median value of all values of

$$\gamma_{i,j} = \frac{n_{i,j}}{(n_{i,j} - 1)(n_{i,j} - 2)} \sum_{k} \left(\frac{X_{i,jk} - \overline{X}_{i,j}}{s_{i,j}} \right)^{3}$$

over all cells within the submeasure being tested such that all three conditions stated below are true. If no submeasure cells exist that satisfy these conditions, then g=0.

$$\gamma_{1i} > 0$$

$$n_{1i} > 6$$

 $n_{1j} \ge n_{3q}$, where n_{3q} is the 3 quartile of all n_{1j} in cells where the first two conditions are true.

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iii) If g = 0, skip this step. Otherwise, calculate

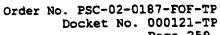
$$t_{\min_j} = \frac{-3\sqrt{n_{1j}n_{2j}n_j}}{g(n_{1j} + 2n_{2j})}$$

$$\begin{aligned} \text{iv)} \quad T_j = \begin{cases} t_j + \frac{g}{6} \left(\frac{n_{1j} + 2n_{2j}}{\sqrt{n_{1j} \, n_{2j} (n_{1j} + n_{2j})}} \right) \left(t_j^2 + \frac{n_{2j} - n_{1j}}{n_{t_j} + 2n_{2j}} \right) & g > 0, t_j \ge t_{\min j} \\ \\ t_j + \frac{g}{6} \left(\frac{n_{1j} + 2n_{2j}}{\sqrt{n_{1j} \, n_{2j} (n_{1j} + n_{2j})}} \right) \left(t_{\min j}^2 + \frac{n_{2j} - n_{lj}}{n_{lj} + 2n_{2j}} \right) & g > 0, t_j < t_{\min j} \end{cases} \end{aligned}$$

$$v) \quad \alpha = P(t_{a_i,-1} \le T_i)$$

That is, α is the probability that a t random variable with n_{1j} - 1 degrees of freedom, is less than

vi)
$$Z_i = \Phi^{-1}(\alpha)$$







Statistical Formulas and Technical Descriptions

Proportion Measure

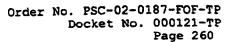
Use the conditions in the following table to determine the method for calculating Z_j .

Condition 1	Condition 2	Condition 3	- Solution = 3
$W_j = 0$	NA	NA	Z _j = 0
		$\min\left\{a_{1j}\left(1-\frac{a_{1j}}{a_{1j}}\right), a_{2j}\left(1-\frac{a_{2j}}{a_{2j}}\right)\right\} \le 9$	Use the exact hypergeometric test: $\alpha = CHG(a_{1j})$
	L=1		$Z_j = \Phi^{-1}(\alpha)$
W _j > 0	$\min\left\{a_{i,j}\left(1-\frac{a_{i,j}}{a_{i,j}}\right), a_{2,j}\left(1-\frac{a_{2,j}}{a_{2,j}}\right)\right\} > 9$	Use the standardize hypergeometric Z score $Z_{j} = \frac{n_{i} a_{1j} - n_{1j} a_{i}}{(n_{1j} - n_{1j} a_{1j} - n_{1j} a_{1j} - n_{1j} a_{1j}}$	
	L>1	NA	$\sqrt{\frac{n_{1j} n_{2j} a_{1j} (n_{j} - a_{j})}{n_{j} - 1}}$

Rate Measure

Use the conditions in the following table to determine the method for calculating $\mathbf{Z}_{\mathbf{j}}$.

Condition 1	Condition 2	Condition 3	Solution
$W_j = 0$	NA	NA	Z _j =0
W _j > 0	L=1		Use the exact binomial test:
		$\min(n_{i_1}, n_{2_j}) \le 15 \text{ or } n_j q_j (1-q_j) \le 9$	$\alpha = CBN(a_{ij})$
			$Z_j = \Phi^{-1}(\alpha)$
		$\{\min(n_{1j},n_{2j})>15, n_jq_j(1-q_j)>9\}$	Use the standardize binomial Z score
	L>1	NA	$Z_{j} = \frac{n_{1j} - n_{j} q_{j}}{\sqrt{n_{j} q_{j} (1 - q_{j})}}$





Statistical Formulas and Technical Descriptions

Obtain a Truncated Z Value for Each Cell (Z j)

To limit the amount of cancellation that takes place between cell results during aggregation, cells whose results suggest possible favoritism are left alone. Otherwise the cell statistic is set to zero. This means that positive equivalent Z values are set to 0, and negative values are left alone. However, if there is only one cell, this is unnecessary. Mathematically, this is written as

$$Z_{j}^{*} = \begin{cases} Z_{j} & L = 1\\ \min(0, Z_{j}) & \text{otherwise} \end{cases}$$

Recall that L is the total number of occupied cells with positive weight for the test.

Calculate the Theoretical Mean and Variance of the Truncated Statistic Under the Null Hypothesis of Parity

To compensate for the truncation in Obtain a Truncated Z Value for Each Cell (Z^*j) an aggregated, weighted sum of the Z_j^* must be centered and scaled properly so that the final aggregate statistic follows a standard normal distribution.

Note: If there is only one occupied cell with positive weight, that is, L = 1, then the following calculations are not needed.

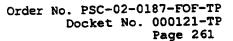
There are three possibilities in this procedure:

1. If $W_j = 0$, then no evidence of favoritism is contained in the cell. The formula for calculating

$$E(Z_j^*|H_0)$$
 and $Var(Z_j^*|H_0)$ cannot be used. Set both equal to 0.

2. If one of the following statements in the 'lf' column is true, use the formulas in the 'Then' column.

Measure Type	H .	Then
Mean	$\min(n_{1j}, n_{2j}) > 6$ and $s_{1}^2 > 0$	$E(Z_j^* H_0) = -\frac{1}{\sqrt{2\pi}}$
Proportion	$\min\left\{a_{1i}\left(1-\frac{a_{1j}}{a_{1j}}\right), a_{2j}\left(1-\frac{a_{2j}}{a_{2j}}\right)\right\} > 9$	√∠π and
Rate	$min(n_{1_j}, n_{2_j}) > 15 \text{ and } n_{1}q_{1}(1-q_{1}) > 9$	$Var(Z_j^* H_0) = \frac{1}{2} - \frac{1}{2\pi}$





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3. Otherwise, determine the total number of values for Z_{j}^{*} . Let Z_{ji} and θ_{ji} denote the values of Z_{j}^{*} and the probabilities of observing each value, respectively.

$$E(Z_{j}^{\bullet} \mid H_{0}) = \sum_{i} \theta_{ji} Z_{ji} \qquad Var(Z_{j}^{\bullet} \mid H_{0}) = \sum_{i} \theta_{ji} Z_{ji}^{2} - \left[E(Z_{j}^{\bullet} \mid H_{0})\right]^{2}$$
and

The actual value of z and θ depends on the type of measure. Use the table below to calculate z and θ .

Measure Type	Formulas ·	
Mean	$N_{j} = min(M_{j}, 1,000), i = 1,, N_{j}$ $z_{ji} = min\left\{0, \Phi^{-1}\left(1 - \frac{R_{i} - 0.5}{N_{j}}\right)\right\} \text{ where } R_{i} \text{ is the rank of sample sum } i$ $\theta_{j} = \frac{1}{N_{j}}$	
Proportion	$z_{\mu} = \min \left\{ 0, \frac{n_{1} i - n_{1} a_{1}}{\sqrt{\frac{n_{1} n_{2} a_{1} (n_{j} - a_{1})}{n_{j} - 1}}} \right\}, i = \max(0, a_{j} - n_{2j}), \dots \min(a_{j}, n_{1j})$ $\theta_{ji} = HG(i)$	
Rate	$z_{\mu} = \min \left\{ 0, \frac{i - n_{i} q_{j}}{\sqrt{n_{j} q_{i}(1 - q_{j})}} \right\}, i = 0,, n_{j}$ $\theta_{\mu} = BN(i)$	

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Calculate the Aggregate Test Statistic, Z^T

Calculate the aggregate test statistic, Z^T , using the following formula.

$$Z^{\mathsf{T}} = \begin{cases} Z_1 & L = 1\\ \sum_{j} W_j Z_i^* - \sum_{j} W_j E(Z_j^* | H_0) \\ \sqrt{\sum_{i} W_j^2 Var(Z_j^* | H_0)} & \text{otherwise} \end{cases}$$

Balancing Critical Value 3.

There are four key elements of the statistical testing process:

Symbol	Element	Description
H ₀	Null hypothesis	parity exists between ILEC and ALEC services
Ha	alternative hypothesis	the ILEC is giving better service to its own customers
z ^T	truncated Z statistic	
c	critical value	

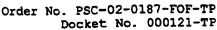
The decision rule³ using these elements is summarized below.

$$\begin{array}{lll} & & & \\ &$$

There are two types of errors possible when using such a decision rule:

- Deciding favoritism exists when there is, in fact, no favoritism Type I Error
- Deciding parity exists when there is, in fact, favoritism. Type II Error

^{3.} This decision rule assumes that a negative test statistic indicates poor service for the ALEC customer. If the opposite is true, then reverse the decision rule.



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The probabilities of each type of error are:

- $\alpha = P(Z^T < c \mid H_0)$ Type I Error
- $\beta = P(Z^T \ge c \mid H_*)$ Type II Error

We want a balancing critical value, c_B , so that $\alpha = \beta$.

it can be shown that

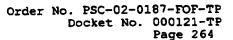
$$c_{g} = \frac{E(Z^{T} \mid H_{o}) - E(Z^{T} \mid H_{o})}{SE(Z^{T} \mid H_{o}) + SE(Z^{T} \mid H_{o})}$$

when ZT is approximately normally distributed. The derivation of the components of this equation depends on the form of the null and alternative hypotheses, as well as other factors.

Test Hypotheses

Measure Type	Null Hypothesis, H ₀	Alternative Hypothesis, H
Mean	$\mu_{1j} = \mu_{2j}, \sigma_{1j}^2 = \sigma_{2j}^2$	$\mu_{2j} = \mu_{1j} + \delta_{j} \cdot \sigma_{1j}, \ \sigma_{2j}^{2} = \lambda_{j} \cdot \sigma_{1j}^{2} \delta_{j} > 0, \ \lambda_{j} \ge 1$
Proportion	P ₂₁ = P ₁₃	$\arcsin(\sqrt{p_{21}}) - \arcsin(\sqrt{p_{11}}) = \frac{\delta_1}{2}$
Rate	r _{2j} = r _{1j}	$\sqrt{r_{a_1}} - \sqrt{r_{i_1}} = \frac{\delta_i}{2}$

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Statistical Formulas and Technical Descriptions

Determining the Parameters of the Alternative Hypothesis

Parameter Choices for δ_j – set of parameters δ_j are important because they directly index differences in service. The Florida commission staff has chosen to use one value across all cells for a submeasure test $(\delta_j = \delta)$. The value of δ will be based on the effective number of ALEC transaction used in the test. The following formulae will be used to determine δ .

1)
$$\Omega_{r} = \begin{cases} \frac{W_{r}}{\sqrt{\frac{2r}{2r}}} & \text{mean or proportion measure} \\ \frac{W_{r}}{\sqrt{\frac{2r}{r}}} & \text{rate measure} \end{cases}$$

$$2) \qquad n_{r} = \frac{\left(\sum \Omega_{r} n_{2}\right)^{r}}{\sum \Omega_{r}^{2} n_{2}}$$

Note, that given the definition of W_j for mean measures, Ω_j is either 0 or 1. Thus, n_e for mean measures is the total number of ALEC transactions across cells with positive weight. Also, when there is only one occupied cell with positive weight, then $n_e = n_{2j}$, the ALEC sample size in the single cell.

3)
$$\delta = \left(\frac{4}{n_s^2}\right)^{0.65}$$

Parameter Choices for λ_j — set of parameters λ_j index alternatives to the mean measure null hypothesis that arise because there might be greater unpredictability or variability in the delivery of service to an ALEC customer over that which would be achieved for an otherwise comparable ILEC customer. While concerns about differences in the variability of service are important, it turns out that the truncated Z test is relatively insensitive to all but very large values of the λ_j . Put another way, reasonable differences in the values chosen here could make very little difference in the balancing points chosen. Hence,

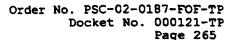
$$\lambda_j = 1$$
 $j = 1,...,L$

Calculate the Mean and Standard Error of Z_j Under the Alternative Hypothesis

Let m_j and se, be the mean and standard error of Z_j under the alternative hypothesis. The distribution of the cell statistic depends on the measurement type.

Mean Measure

 Z_1 is approximately normally distributed with mean 0 and standard error 1 under the null hypotheses. Under the alternative hypothesis, the distribution is approximately normal with mean and variance given in the table below.





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Proportion Measure

In this case, Z; is approximately the same as

$$Z = \frac{\arcsin\left(\sqrt{\frac{a_{11}}{a_{11}}}\right) - \arcsin\left(\sqrt{\frac{a_{21}}{a_{21}}}\right)}{\frac{1}{2}\sqrt{\frac{1}{a_{11}} + \frac{1}{a_{21}}}}$$

which is approximately normally distributed with mean 0 and standard error 1 under the null hypotheses. Under the alternative hypothesis, the distribution is approximately normal with mean and standard error given in the table below.

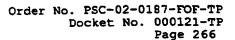
Rate Measure

In this case, Z_i is approximately the same as

$$Z = \frac{\sqrt{\frac{a_{11}}{b_{11}} - \sqrt{\frac{a_{21}}{b_{21}}}}}{\frac{1}{2}\sqrt{\frac{1}{b_{11}} + \frac{1}{b_{21}}}}$$

which is approximately normally distributed with mean 0 and standard error 1 under the null hypotheses. Note that this statistic is approximately the same as

$$Z = \frac{\arcsin\left(\sqrt{\frac{a_{1,i}}{b_{1,j}}}\right) - \arcsin\left(\sqrt{\frac{a_{2,i}}{b_{2,j}}}\right)}{\frac{1}{2}\sqrt{\frac{1}{a_{1,i}} + \frac{1}{b_{2,i}}}}$$





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when the BST and CLEC sample rates are close to 0. Under the alternative hypothesis, the distribution is approximately normal with mean and standard error given in the table below.

Maesure Type		\$6
Mean		
Proportion	$-\delta\sqrt{\frac{n_{1j}n_{2j}}{n_{ij}+n_{2j}}}$	1
Rate	$-\delta\sqrt{\frac{b_{1j}b_{2j}}{b_{1j}+b_{2j}}}$	

Calculate the Critical Value

Single Cell Test (L = 1)

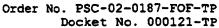
$$c_B = \frac{\mathbf{m_j}}{\mathbf{se_j} + 1} = \frac{\mathbf{m_j}}{2}$$
 since $\mathbf{se_j} = 1$ in all cases.

Multi-Cell Tests (L > 1)

Calculate the critical value according to the following procedure.

Calculate the theoretical mean and variance of the truncated statistic under the null hypothesis of parity, E(Z₁¹H₀) and Var(Z₁¹H₀), within each cell.

Condition	E(Zjil.)	y de la companya de l
$W_j = 0$	0	0
W _j > 0	$-\frac{1}{\sqrt{2\pi}}$	$\frac{1}{2} - \frac{1}{2\pi}$



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2. Calculate the theoretical mean and variance of the truncated statistic under the alternative hypothesis, $E(Z_i^*H_i)$ and $Var(Z_i^*H_i)$, within each cell.

Condition	E(Ž)B;)	
W _j = 0	0	0
W _j > 0	$m_j\Phi(-m_j)-\phi(-m_j)$	$(\mathbf{m}_{j}^{2}+1)\Phi(-\mathbf{m}_{j})-\mathbf{m}_{j}\phi(-\mathbf{m}_{j})-\mathbf{E}(\mathbf{Z}_{j}^{\prime}\mid\mathbf{H}_{\bullet})^{2}$

Note: $\Phi(\cdot)$ is the cumulative standard normal distribution function, and $\phi(\cdot)$ is the standard normal density function.

3.
$$c_{B} = \frac{\sum_{j} W_{j} E(Z_{j}^{*} \mid H_{a}) - \sum_{j} W_{j} E(Z_{j}^{*} \mid H_{0})}{\sqrt{\sum_{j} W_{j}^{2} V \operatorname{ar}(Z_{j}^{*} \mid H_{a})} + \sqrt{\sum_{j} W_{j}^{2} V \operatorname{ar}(Z_{j}^{*} \mid H_{0})}}$$



BST SEEM Remedy Calculation Procedures

Appendix E: BST SEEM Remedy Calculation Procedures

Four sample calculations are included in this appendix. These calculations cover the following:

- Tier 1 Calculation for Retail Analogs
- Tier 2 Calculation for Retail Analogs
- Tier I Calculation for Benchmarks
- Tier 2 Calculations for Benchmarks

1. Tier 1 Calculation for Retail Analogs

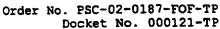
Complete the steps below to calculate performance for a Tier 1 retail analog. An example follows the procedure.

- Calculate the overall test statistic for each ALEC; Z^T_{ALEC-1} (per statistical methodology discussed in Appendix D).
- Calculate the balancing critical value (^CB_{ALEC-1}) that is associated with the alternative hypothesis (for fixed parameters δ, Ψ, or ε).
- 3. Determine parity or disparity by subtracting the value of Step 2 from that of Step 1. ABS(Z_{ALEC-1}^T $C_{B_{ALEC-1}}$)
- 4. Determine the relationship of the overall test statistic (from Step 1) and the balancing critical value (from Step 2).

Relationship	Action
CBALEC-1 ≥ ZTALEC-1	No payment is necessary. End procedure.
CBALEC-I < ZTALEC-1	Go to Step 5.

 Determine the payment to ALEC-1 by obtaining the appropriate dollar amount from the Tier 1 fee schedule (Appendix A) for the measurement category containing the submetric being evaluated.

ALEC Payment = fee (\$\$) from Tier 1 fee schedule for the appropriate measurement category.



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BST SEEM Remedy Calculation Procedures

Tier 1 Retail Analog Example:

Percent Missed Installation Appointments, "Dispatch In" < 10 circuits, UNE Loop and Port Combo, Month 1

Note: Statistics are for illustrative purposes only. While the plan is measurement based, the number of transactions are used in the calculations to determine pass or fail status.

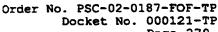
Cell	ILEC Misses	ILEC trans_count	CLEC Misses	CLEC trans_count		
1	0	263	0	i	0	O
2	0	150	0	4	0	(
3	0	847	0	1	0	
4	108	1771	0	1	0.044565652	0.044466294
5	0	10	0	2	0	
6	24	104	0	3	0.169841555	0.16430643
7	0	82	0	9	0	
8	8	114	1	8	0.264906471	0.24651897
9	14	241	2	11	-5.302645611	0.35177449
10	0	198	0	3	0	
11	17	235	1	11	0.213200716	0.20352769
otal counts	171	4015	3	54	NA	N/

The results are summarized below.

Percent Missed	
BST	4.26%
CLEC	5.56%

Aggregate Z = -3.4923	
BCV = -1.83311	
Difference = negative (failure)	

The metric fails. The payment made to the ALEC for this failure would be based on the fee of \$4,550 as listed in the Tier 1 Fee Schedule for Provisioning-UNE (CCC).







BST SEEM Remedy Calculation Procedures

Tier 2 Calculation for Retail Analogs 2.

Tier 2 is triggered by three consecutive monthly failures of any Tier 2 remedy plan submetric. Calculate monthly statistical results and failures per submetric as outlined below for the ALEC aggregate performance.

1. Determine the Tier 2 payment for the state designated agency from the Tier 2 fee schedule (Appendix A) for the measurement category containing the submetric being evaluated.

State designated agency payment = fee (\$\$) from Tier 2 Fee Schedule

Example:

Percent Missed Installation Appointments Dispatch < 10 - Resale Centrex

Cell	ILEC Misses	ILEC trans_count	CLEC Misses	CLEC trans_count	Cell Z Score	Cell Weight
i	0	22	1	11	-0.57735	0.375
2	. 3	18	1	10	-1.732051	0.405046
3	1	15	0	9	2.5553	0.213211
4	0	17	1	11	-1.154701	0.213211
Total counts	4	72	3	41	NA	NA

Percent Missed		Aggregate $Z = -1.73205$.
BST	5.56%	BCV =-0.55526
CLEC	7.32%	Difference = negative (failure)

The measure fails. The payment made to the state designated agency for this failure would be \$3.450, the fee listed in the Tier 2 Fee Schedule.

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BST SEEM Remedy Calculation Procedures

3. Tier 1 Calculation for Benchmarks

Use the procedure below to calculate results for benchmarks with five or more observations. An example follows the procedure.

- 1. For each ALEC with five or more observations, calculate monthly performance results for the State.
- 2. Determine the benchmark.

Benchmark Source			
Invalid sample size. No payment is neces- sary.			
Use equivalent benchmark from Table E-1 A			
SQM			

^A Collocation - Percent Missed Due Dates does not use the small sample size table. Obtain all benchmarks from the SQM.

Table E-1: Small Sample Size Table

90% Sample Size		95% \$	Sample Size 85% Sample		ample Size	97% Sample Size	
Size	Benchmark	Size	Benchmark	Size	95% Equivalent	Size	95% Equivalent
5	60.00%	5	80.00%	5	60.00%	5	80.00%
6	66.67%	6	83.33%	6	66.67%	6	83.33%
7	71.43%	7	85.71%	7	57.14%	7	85.71%
8	75.00%	8	75.00%	8	62.50%	8	87.50%
9	66.67%	9	77.78%	9	66.67%	9	88.89%
10	70.00%	10	80.00%	10	70.00%	10	90.00%
11	72.73%	11	81.82%	11	63.64%	11	90.91%
12	75.00%	12	83.33%	12	66.67%	12	91.67%
13	76.92%	13	84.62%	13	69.23%	13	84.62%
14	78.57%	14	85.71%	14	71.43%	14	85.71%
15	73.33%	15	86.67%	15	66.67%	15	86.67%
16	75.00%	16	87.50%	16	68.75%	16	87.50%
17	76.47%	17	82.35%	17	70.59%	17	88.24%
18	77.78%	18	83.33%	18	72.22%	18	88.89%
19	78.95%	19	84.21%	19	68.42%	19	89.47%
20	80.00%	20	85.00%	20	70.00%	20	90.00%
21	76.19%	21	85.71%	21	71.43%	21	90.48%
22	77.27%	22	86.36%	22	72.73%	22	90.91%
23	78.26%	23	86.96%	23	73.91%	23	91.30%
24	79.17%	24	87.50%	24	70.83%	24	91.67%



Florida Plan

BST SEEM Remedy Calculation Procedures

Table E-1: Small Sample Size Table (Continued)

90% Sample Size S		95% \$	95% Sample Size		85% Sample Size		ample Size
Size	Benchmark	Size	Benchmark	Size	95% Equivalent	Size	95% Equivalent
25	80.00%	25	88.00%	25	72.00%	25	92.00%
26	80.77%	26	88.46%	26	73.08%	26	92.31%
27	81.48%	27	88.89%	27	74.07%	27	92.59%
28	78.57%	28	89.29%	28	75.00%	28	89.29%
29	79.31%	29	86.21%	29	72.41%	29	89.66%
30	80.00%	30	86.67%	30	73.33%	30	90.00%

Determine whether the monthly performance percentage meets the benchmark standard (or equivalent percentage for small samples).

Monthly Performance and Benchmark Relationship	Action		
Monthly performance ≥ benchmark	No payment is necessary; end procedure.		
Monthly performance < benchmark	Failure; go to Step 4.		

4. Determine the payment to ALEC-1 by obtaining the appropriate dollar amount from the Tier 1 fee schedule (Appendix A) for the measurement category containing the submetric being evaluated.

ALEC-1 payment= \$\$ from Tier 1 Fee Schedule

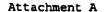
Tier 1 Benchmark, Small Sample Size Example:

Reject Interval Fully Mechanized 2-Wire Analog Loop Non-Design; Benchmark = 97%: Month 1

Numerator	Denominator	CLEC Performance	Benchmark (small sample size of 9)	Pass/Fail
7	9	77.78% ≤ 1 hour	88.89% ≤ 1 hour (small sample size of 9) ^A	fail

[^] The comparison benchmark of 88.89% was obtained from the Table E-1 (the small sample size table) for 97% benchmarks.

Payment to the ALEC would be \$450, the fee obtained from Ordering measures in the Tier 1 fee schedule.



Order No. PSC-02-0187-FOF-TP Docket No. 000121-TP

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Florida Plan

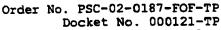
BST SEEM Remedy Calculation Procedures

Tier 1 Benchmark Example:

Reject Interval - Partially Mechanized, Business; Benchmark is 95%; Month I

•	Numerator	Denominator	CLEC Performance	Benchmark	Pass/Fail
	36	40	90% ≤ 10 hours	95% ≤ 10 hours	fail

Payment to the ALEC would be \$450, the fee obtained from Ordering measures in the Tier I fee schedule.



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Florida Plan

BST SEEM Remedy Calculation Procedures

4. Tier 2 Calculations for Benchmarks

Tier-2 calculations for benchmark measures are the same as the Tier 1 benchmark calculations, except the ALEC aggregate data is evaluated over three consecutive months.

- 1. Accumulate the statewide monthly results for the measurement.
- 2. Determine whether the current month fails the statewide average.

Current Month Tier 2 Failure	Action
Yes	Go to Step 3.
No	No Tier 2 payment is necessary; end procedure.

3. Determine whether there is a Tier 2 failure.

· Tier 2	· Tier 2 Failure		
One Month Prior to Current Month	Two Months Prior to Current Month		
Failure	Faiture	Go to Step 4.	
Failure	Pass	No Tier 2 failure, no pay- ment. End of procedure.	
Pass	Pass Failure		

4. Determine the payment to the state designated agency by obtaining the appropriate dollar amount from the Tier 2
Fee Schedule (Appendix A) for the fee measurement category containing the submetric being evaluated.

State designated agency payment = Fee (\$\$) from Tier 2 Fee Schedule for the appropriate measurement category.

Tier 2 Benchmark Example:

Percent Missed Installation Appointments - LNP; Benchmark = 95%

Month	Numerator	Denominator	CLEC Performance (%)	Benchmark (%)	Pass/Fall .
Current	1	8	87.5	95	fail
One month prior to Current	3	39	92.31	95	fail
Two months prior to current	4	75	94.6	95	fail

Payment to the state would be \$5,700, the fee obtained from the LNP category in the Tier 2 Fee Schedule.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (BELLSOUTH TRACK)

DOCKET NO. 000121A-TP ORDER NO. PSC-02-0989-PAA-TP ISSUED: July 22, 2002

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman J. TERRY DEASON BRAULIO L. BAEZ MICHAEL A. PALECKI RUDOLPH "RUDY" BRADLEY

NOTICE OF PROPOSED AGENCY ACTION
ORDER REVISING PERFORMANCE ASSESSMENT PLAN

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

BACKGROUND

We opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of operations support systems (OSS) provided for alternative local exchange carriers' (ALECs) use by incumbent local exchange carriers (ILECs). Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS. Performance monitoring is necessary to ensure that ILECs are meeting their obligation to provide unbundled access, interconnection and resale to ALECs in a nondiscriminatory manner. Additionally, it establishes a standard

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against which ALECs and this Commission can measure performance over time to detect and correct any degradation of service provided to ALECs.

Docket No. 000121-TP consists of three phases. Phase I began with workshops conducted by our staff with members of the ALEC and ILEC communities. These workshops were held on March 30, 2000, August 8, 2000, and December 13, 2000. The purpose of Phase I was to determine and resolve any policy and legal issues in this matter. Phase II involved establishing permanent metrics for BellSouth Telecommunications, Inc. (BellSouth), including a specific monitoring and enforcement program. With the completion of Phase II, we are beginning Phase III of this docket, which entails the establishment of performance metrics and a performance monitoring and evaluation program for the other Florida ILECs.

By Order No. PSC-01-1819-FOF-TP, issued September 10, 2001, (Final Order), we established permanent performance measures and benchmarks as well as a voluntary self-executing enforcement mechanism (Performance Assessment Plan) for BellSouth. By Order No. PSC-02-0187-FOF-TP, issued February 12, 2002, as amended by Order No. PSC-01-0187A-FOF-TP, issued March 13, 2002, BellSouth's Performance Assessment Plan was approved.

By Order No. PSC-02-0503-PCO-TP, issued April 11, 2002, Docket No. 000121-TP was divided into three sub-dockets: (1) 000121A-TP, in which filings directed towards the BellSouth track would be placed; (2) 000121B-TP, in which filings directed towards the Sprint track would be placed; and (3) 000121C-TP, in which filings directed towards the Verizon track would be placed.

This order resolves outstanding issues with the BellSouth OSS test and is therefore linked to Dockets 960786B-TL and 981834-TP. However, because the issues raised here are related to Service Quality Measures, the method of effecting change in this case is through Docket 000121A-TP.

We are vested with jurisdiction over this matter pursuant to Sections 364.01(3) and (4)(g), Florida Statutes. Pursuant to Section 364.01(3), Florida Statutes, the Florida legislature has found that regulatory oversight is necessary for the development of fair and effective competition in the telecommunications industry.

To that end, Section 364.01 (4) (g), Florida Statutes, provides, in part, that we shall exercise our exclusive jurisdiction to ensure that all providers of telecommunications service are treated fairly by preventing anticompetitive behavior. Furthermore, it is noted that the FCC has encouraged the states to implement performance metrics and oversight for purposes of evaluating the status of competition under the Telecommunications Act of 1996.

FLOW-THROUGH

Flow-through is the ability of an ALEC's electronically submitted order to flow from the OSS interface to BellSouth's ordering systems and on to completion without human intervention. Flow-through of Local Service Requests (LSRs) is critical to the ALECs' ability to deliver service to customers in a timely manner. Fall-out of LSRs for manual handling can result in delays in the return of confirmations or errors and may have a negative impact on the timeliness of the completion of ALEC orders. Ultimately, these delays can result in a lower level of customer satisfaction and ultimately lead to loss of the ALEC's customer altogether.

In Docket No. 960786B-TL, the OSS Test Manager, KPMG Consulting, conducted transaction testing to determine if BellSouth's systems process order transactions in accordance with Service Quality Measures approved in Order No. PSC-00-2451-PAA-TP and PSC-01-1428-PAA-TL. According to the Florida Interim Service Quality Measurement Plan, Version 3.0, dated June 1, 2001, the benchmarks for the components of Percent Flow-Through Service Requests are:

SQM Flow-Through Benchmark	.s
Residence	95%
Business	90%
Unbundled Network Elements (UNE)	85%
Local Number Portability (LNP)	85%

As a result of OSS testing and evaluation criteria, KPMG Consulting issued a "Not Satisfied" for UNE flow-through, meaning that this issue may have a significant business impact on ALECs.

During the initial production testing, from March 13, 2001 through November 25, 2001, KPMG Consulting experienced a 73.50 percent UNE flow-through rate. KPMG Consulting issued Exception 136 on January 15, 2002, detailing that BellSouth's performance of 82.14 percent on UNE flow-through during testing through January 4, 2002, was below the SQM benchmark of 85 percent. BellSouth's response to Exception 136 indicated that a defect modification was completed in a release in February 2002 to address orders that fell out for manual handling due to a due date calculation problem.

Based on retesting results through March 24, 2002, KPMG Consulting issued Second Amended Exception 136. The amendment noted that BellSouth's performance on UNE flow-through of 74.6 percent was again below the SQM benchmark of 85 percent. BellSouth's response indicated that a system enhancement was opened and implemented on June 1, 2002, to increase the opportunity for flow-through of xDSL migration orders. Exception 136 remains open.

Detailed KPMG Consulting results for UNE products are as follows:

KPMG Consulting UNE	Flow-Through Tes	sting Result	ts
	Initial Test	Retest 1	Retest 2
Number of Expected Flow- Through	566	196	378
Number of Flow-Through	416	161	282
Percent Flow-Through	73.50%	82.14%	74.60%
SQM Benchmark	85%	85%	85%

(Source: BellSouth Telecommunications, Inc. OSS Evaluation Report, pg POP-274)

As a result of failing the OSS test for UNE flow-through, we reviewed the aggregate commercial data for the flow-through metric. Residential and Business flow-through for December 2001 through March 2002 have consistently fallen below the benchmark as indicated in the table below. This table presents the most recent

four months of available ALEC commercial data results reported by BellSouth:

Aggregate Commercial Data Results December 2001-March 2002								
Benchmark Dec Jan Feb March								
Residential	95%	89.50%	88.56%	87.17%	86.49			
Business	90%	74.07%	74.56%	75.20%	73.55%			
UNE	85%	82.67%	85.50%	84.86	83.88%			
LNP	85%	87.62%	92.81%	94.12%	92.25%			

Source: Varner Affidavit dated May 24, 2002, filed in Docket 960786B-TP and BellSouth Monthly Performance Summary Report, January 2002. (Shading denotes failure to meet benchmark.)

As noted above, BellSouth has consistently failed to achieve the benchmark for Residential, Business, and UNE flow-through. Flow-through, in general, is an important issue for ALECs. UNE flow-through is especially important to ALECs in Florida because UNEs are a step in the direction of facilities-based competition. As such, a more proactive approach will be taken to motivate BellSouth to perform at or above the benchmark for all elements of flow-through.

To this end, PellSouth shall file a specific action plan by July 30, 2002, that would reduce BellSouth-caused fall-out and result in compliance with benchmarks. In addition, BellSouth shall adjust its Self-Effectuating Enforcement Mechanism (SEEM) to establish a greater monetary incentive to meet the minimum flow-through benchmark for this metric.

We are also modifying the approved BellSouth SEEM and establishing a separate remedy payment schedule for flow-through.

Proposed Tier 1

The "Ordering (0-4): Percent Flow-Through Service Requests (Detail) " metric provides flow-through results by individual ALEC. Currently, if BellSouth flow-through for a particular ALEC falls below the benchmark, payments under Tier 1 progress as follows:

Current SEEM Tier 1 Payments							
Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	
Ordering	\$450	\$650	\$800	\$1,000	\$1,150	\$1,350	

Mechanism Enforcement Self-Effectuating Florida (Source: Administrative Plan, pg A-1)

Since recent flow-through results have, in general, not achieved benchmarks, we find it necessary to add a separate category and schedule of payments to address flow-through. Flowthrough results which do not meet the benchmark for any one month would trigger payments per affected item as indicated below:

Proposed SEEM Tier 1 Payments							
Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	
Flow Through	\$900	\$1,300	\$1,600	\$2,000	\$2,300	\$2,700	

We are increasing the payments for flow-through because the SEEM plan has been approved since February 12, 2002, yet there has not been a positive impact on flow-through results. We find that significant action is needed at this time.

Proposed Tier 2

The "Ordering (0-3): Percent Flow-Through Service Requests (Summary)" metric is applicable to the Tier 2 SEEM. The Tier 2 remedy payment for Ordering, which included flow-through, is

currently \$700 and is triggered when aggregate ALEC performance trails the benchmark for three consecutive months.

Tier 2 payments for flow-through, currently at \$700, shall be set at \$1,400 per month. Unlike the current scheme for Tier 2, which imposes payments after results fall below the benchmark for three consecutive months, payments for flow-through shall be imposed each month BellSouth fails to meet the benchmark.

Moreover, this modification to the Self-Effectuating Enforcement Mechanism Administrative Plan shall be revisited during the six-month review to determine if performance warrants continuance of the special Tier 1 and Tier 2 payment scheme for flow-through.

SOFTWARE DEFECTS

Defective software releases are a significant issue that has emerged from the Florida Third Party Test of BellSouth's OSS. Software defects impair effective ALEC use of BellSouth's ordering, pre-ordering, billing, maintenance and repair systems. ALECs also incur increased costs for having to use manual systems when electronic interfaces fail.

KPMG Consulting Exception 123

Exception 123 states that BellSouth is not classifying change requests as defects in accordance with the BellSouth definition of a defect. KPMG Consulting identified a number of instances where defects were classified inappropriately as new features. According to KPMG Consulting, BellSouth is required to provide alternatives and/or fixes for all defect change requests within a specified time frame. However, issues classified as features or not opened at all are not subject to any resolution time frame. KPMG Consulting states that the lack of timely workarounds and resolutions to defects may result in the ALEC's inability to efficiently execute transactions with BellSouth resulting in ALEC customer dissatisfaction.

KPMG Consulting Exception 157

Exception 157 states that BellSouth fails to follow its software testing and quality processes. According to KPMG Consulting, BellSouth's incomplete internal software testing may affect an ALEC's ability to efficiently execute transactions with BellSouth, resulting in ALEC customer dissatisfaction. KPMG Consulting states that BellSouth did not completely test code changes for Release 10.2 and 10.3 prior to these releases going into production. The exception cited internal BellSouth documentation that showed BellSouth had "no plan to mitigate the adverse effect of reduced pre-release testing."

Exception 157 states that there were numerous "significant defects in the software when the releases were placed into the production environment." Exception 157 reveals that in Release 10.2 of September 2001, there were ten defects when the release was placed into production. In Release 10.3 of January 2002, there were 31 defects, and, in Release 10.5 in May 2002, there were an additional eleven defects in the software upon release into production.

According to KPMG Consulting, BellSouth identified and published 31 defects contained in the 10.3 release since its January 5, 2002, implementation. As of January 22, 2002, there was a backlog of 61 defect change requests with only 37 scheduled for correction in the April 2002 release.

BellSouth Response to Exceptions 123 and 157

In its post-workshop supplemental data submission on May 31, 2002, for Docket 960786B-TL, BellSouth argues that, notwithstanding the current and ongoing status of the two exceptions, the FCC together addressed these complaints adequately BellSouth believes Georgia/Louisiana 271 application approval. that due to information it provided to the FCC in its application, and supported by the Georgia Public Service Commission in its comments, the FCC did not concur with "commenters' assertions that BellSouth fails to implement corrections to defects in a timely manner and that there are unnecessary defects because BellSouth's software implementations are not sufficiently tested before BellSouth agrees that reducing coding defects is release." beneficial for ALECs and that software releases with numerous defects can inhibit a smooth transition between releases.

BellSouth claims that the FCC found "that BellSouth demonstrates that most of these defects have a very small impact and have been corrected quickly and within the time frames set by the Change Control Process." BellSouth points out that the FCC noted the BellSouth explanation that, of the 38 defects outstanding as of March 5, 2002, a number were scheduled or targeted for implementation this year.

BellSouth contends that the evidence shows that it adequately tests for defects. As affirmation of its resolve to properly test and implement releases, BellSouth points to the recent testing of Release 10.5. This release contained numerous complex features and defect fixes. BellSouth claims that appropriate notifications leading up to the implementation were provided to ALECs. BellSouth notes that Release 10.5 was also available to ALECs in the CLEC Application Verification Environment (CAVE). BellSouth discovered certain defects for which there was no workaround or fixes by the scheduled date for implementation. BellSouth argues that it acted appropriately by delaying Release 10.5 for two weeks.

BellSouth contends that such discoveries are not the result of inadequate testing but rather the result of extensive and intensive internal testing. It believes that ALECs will be better served by the delay in terms of receiving a better release, as well as gaining an additional two weeks of testing their own scenarios. BellSouth states that the ALEC complaints, as well as the Florida Third Party Exceptions, are based upon situations occurring prior to the development of new Change Control Process language regarding "ALEC-affecting" defects and revisions to the software testing processes (including additional ALEC testing capabilities in CAVE).

We are concerned that some BellSouth releases have contained so many defects that software development resources are being dedicated to correcting those defects after a release, which may be diverting resources from addressing and providing ALEC-requested new features. This contributes to the backlog of unimplemented change requests.

We understand that Release 10.5 was delayed due to newly found defects just prior to the scheduled implementation date. As a result, Release 10.6 and 11.0 have each been delayed three weeks to a month. BellSouth contends that the delay of Release 10.5

demonstrates that it adequately tests for defects. We agree that a delay is better than putting a problematic release into production just to meet the announced schedule. However, BellSouth's argument does not address the resulting after effects of the delay. Not only did Release 10.5 contain additional defects after it went into production, but BellSouth has announced that two upcoming releases will be delayed three weeks to a month each. We find that BellSouth is in a spiral in which it is unable to implement releases both on schedule and with only a reasonable number of defects.

For example, on June 10, 2002, the BellSouth Quarterly Tracking Reports showed that 76 percent of the Change Requests BellSouth has implemented since the Change Control Process began in 1998 have been for defects. According to the current BellSouth Release Log for the month of May 10 to June 10, 2002, 87 percent of the Change Requests implemented were for defects.

We are concerned that the problems in Release 10.5 were found so close to the originally scheduled release date. If BellSouth testing procedures and resources are adequate, why are severe defects being found so late in release development? Moreover, we are concerned that while the delay may have prevented some serious defects from going into production, there were still high and medium-impact defects in Release 10.5 after it was placed into production. Based on the above, we cannot concur with BellSouth's contention that it adequately tests for defects.

Tighter software defect correction intervals will diminish concerns about miscoding the severity levels of defects by BellSouth. ALECs and our staff have observed numerous instances of miscoding of defect severity levels. Defect correction intervals are tied to BellSouth assigned severity codes. Defects coded as "low impact" have an open-ended resolution time period, which is stated in the Change Control document as "best effort."

In addition, we find that tighter defect software intervals with associated metrics will incent BellSouth to improve the quality of software releases rather than suffer penalties for excessive defects. The metrics to be implemented for defect correction interval measurement is contained in Attachment 1. The metric is Percent of Software Error Corrected in X (10, 30, 45)

Business Days. This metric will expedite defect correction. Tier 2 remedy payments are applicable to this metric. Additionally, we are implementing a metric titled Number of Defects in Production Releases. This metric will capture the number of defects associated with a release within the initial three-week period of its implementation. The bulk of defects associated with any release are typically found within three weeks. This metric is shown in Attachment 2.

Adequate testing should help BellSouth meet the twin goals of quality and timeliness. In addition, adequate testing should help BellSouth retain all the scheduled features and defect corrections in a particular release with minimal further defects. In order to potentially resolve this issue, BellSouth shall develop a new metric for Software Validation. The metric shall be designed similar to the Software Validation metric currently in place for Verizon New York. Implementation of a new metric for software validation will require BellSouth to improve and expand the test deck it currently uses to validate scenarios used by ALECs.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that BellSouth Telecommunications, Inc. shall file a specific action plan by July 30, 2002, designed to improve flow-through in order to achieve the flow-through benchmark. It is further

ORDERED that BellSouth Telecommunications, Inc. shall implement the remedy payment schedule for flow-through as detailed in the body of this Order by July 30, 2002 for the August 2002 results. It is further

ORDERED that effective August 1, 2002, BellSouth Telecommunications, Inc. shall implement the metric entitled Percent of Software Error Corrected in X (10, 30, 45) Business Days, described in Attachment 1, which is attached hereto and incorporated herein by reference. It is further

ORDERED that effective August 1, 2002, BellSouth Telecommunications, Inc. shall implement the metric entitled Number of Defects in Production Releases, described in Attachment 2, which

is attached hereto and incorporated herein by reference. It is further

ORDERED that effective August 1, 2002, BellSouth Telecommunications, Inc. shall develop a Software Validation metric similar to that in use for Verizon New York. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event a protest is filed, the resolution of the protest shall be addressed during the six-month review process. It is further

ORDERED that in the event this Order becomes final, this docket shall remain open.

By ORDER of the Florida Public Service Commission this $\underline{22nd}$ day of \underline{July} , $\underline{2002}$.

BLANCA S. BAYÓ, Director Division of the Commission Clerk and Administrative Services

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Kay Flynn, Chief

Bureau of Records and Hearing

Services

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on August 12, 2002.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

ATTACHMENT 1

Percent of Software Errors Corrected in X (10, 30, 45) Business Days

Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

Exclusions

- ♦ Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.
- Rejected or reclassified software error (BellSouth must report the number of rejected or reclassified software errors disputed by the CLECs.)

Business Rules

This metric is designed to measure Bellsouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error validation is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp live/index.html, and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days = (a - b) x 100

a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days. b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

Report Structure

Severity Level 2 = 10 Business Days Severity Level 3= 30 Business Days Severity Level 4 = 45 Business Days

Data Retained

Report Period
Total Completed
Total Completed Within X Business Days
Disputed, Rejected or Reclassified Software Errors

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
	·
Region	95% within interval

SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	х

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	95% within interval

ATTACHMENT 2

Number of Defects in Production Releases (Type 6 CR)

Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

Exclusions

None

Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp live/index.html.

Calculation

The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects, and the number of Type 6 Severity 3 Defects without a mechanized work around.

Report Structure

```
Production Releases

Number of Type 6 Severity 1 defects

Number of Type 6 Severity 2 defects without a mechanized work around

Number of Type 6 Severity 3 defects
```

Data Retained

```
Region
Report Period
Production Releases
Number of Type 6 Severity 1 defects
Number of Type 6 Severity 2 defects without a mechanized work around
Number of Type 6 Severity 3 defects
```

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
RegionNumber of Type 6 Severity 1 defects RegionNumber of Type 6 Severity 2 defects without a mechanized work around RegionNumber of Type 6 Severity 3 defects	O Defects O Defects

SEEM Measure

SEEM Measure		
	Tier I	
No	Tier II	

SEEM Disaggregation - Analog/Benchmark

0	
SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (BELLSOUTH TRACK)

DOCKET NO. 000121A-TP ORDER NO. PSC-02-1094-PAA-TP ISSUED: August 9, 2002

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman J. TERRY DEASON BRAULIO L. BAEZ MICHAEL A. PALECKI RUDOLPH "RUDY" BRADLEY

NOTICE OF PROPOSED AGENCY ACTION
ORDER IMPLEMENTING CHANGE REQUEST METRICS AND
REVISING DUE DATE FOR TIER 1 AND TIER 2 PAYMENTS

BY THE COMMISSION:

BACKGROUND

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

We opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of operations support systems (OSS) provided for alternative local exchange carriers' (ALECs) use by incumbent local exchange carriers (ILECs). Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS. Performance monitoring is necessary to ensure that ILECs are meeting their obligation to provide unbundled access, interconnection and resale to ALECs in a

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nondiscriminatory manner. Additionally, it establishes a standard against which ALECs and this Commission can measure performance over time to detect and correct any degradation of service provided to ALECs.

Docket No. 000121-TP consists of three phases. Phase I began with workshops conducted by our staff with members of the ALEC and These workshops were held on March 30, 2000, ILEC communities. August 8, 2000, and December 13, 2000. The purpose of Phase I was to determine and resolve any policy and legal issues in this Phase II involved establishing permanent metrics for (BellSouth), including a Telecommunications, Inc. BellSouth specific monitoring and enforcement program. With the completion of Phase II, we are beginning Phase III of this docket, which entails the establishment of performance metrics and a performance monitoring and evaluation program for the other Florida ILECs.

By Order No. PSC-01-1819-FOF-TP, issued September 10, 2001, (Final Order), we established permanent performance measures and benchmarks as well as a voluntary self-executing enforcement mechanism (Performance Assessment Plan) for BellSouth. By Order No. PSC-02-0187-FOF-TP, issued February 12, 2002, as amended by Order No. PSC-01-0187A-FOF-TP, issued March 13, 2002, BellSouth's Performance Assessment Plan was approved.

By Order No. PSC-02-0503-PCO-TP, issued April 11, 2002, Docket No. 000121-TP was divided into three sub-dockets: (1) 000121A-TP, in which filings directed toward the BellSouth track would be placed; (2) 000121B-TP, in which filings directed toward the Sprint track would be placed; and (3) 000121C-TP, in which filings directed toward the Verizon track would be placed.

By Order No. PSC-02-0989-PAA-TP, issued July 22, 2002, BellSouth was required to file a specific action plan designed to improve flow-through and adjust the Self Effectuating Enforcement Mechanism (SEEM) for the flow-through metric by July 30, 2002, for the August 2002 results. Additionally, BellSouth was ordered to establish defect correction metrics to be effective August 1, 2002 as part of the Service Quality Measures in Docket No. 000121A-TP.

JURISDICTION

We are vested with jurisdiction over this matter pursuant to Sections 364.01(3) and (4)(g), Florida Statutes. Pursuant to Section 364.01(3), Florida Statutes, the Florida legislature has found that regulatory oversight is necessary for the development of fair and effective competition in the telecommunications industry. To that end, Section 364.01(4)(g), Florida Statutes, provides, in part, that we shall exercise our exclusive jurisdiction to ensure that all providers of telecommunications service are treated fairly by preventing anticompetitive behavior. Furthermore, it is noted that the FCC has encouraged the states to implement performance metrics and oversight for purposes of evaluating the status of competition under the Telecommunications Act of 1996.

CHANGE REQUESTS

A BellSouth-stated objective in the Change Control Process (CCP) document is "[t]imely and effective implementation of feature and defect change requests." However, timely implementation of change requests remains an issue in the Change Control Process.

There is no required time frame for the implementation of ALEC-initiated (Type 5) change requests. As of June 28, 2002, the backlog of new feature change requests had reached 65. The backlog includes new features requested by ALECs, features requested by internal BellSouth organizations (Type 4), and those ordered by various regulatory mandates (Type 2).

ALEC Comments

In the OSS commercial experience workshop, ALECs contended that BellSouth takes too long to implement ALEC-initiated (Type 5) change requests. ALECs have also pointed out that, as of February 2002, BellSouth implemented its own change requests within an average of 60 days while taking an average of 164 days to implement ALEC-initiated change requests. WorldCom noted that in other states no backlog of change requests exists at Verizon. Further, WorldCom stated that Verizon implemented over 170 ALEC-initiated change requests during the same three-year period in which BellSouth implemented only 32.

BellSouth Comments

In recent submissions to the Georgia PSC, BellSouth argues that a mandatory 60-week implementation cycle for prioritized change requests would require that BellSouth commit unlimited resource capacity to meet an infinite (yet undetermined) amount of demand (i.e., number of ALEC-initiated change requests) merely upon the request of ALECs to implement these features. BellSouth said that it fears hundreds of ALECs could make requests for new features. Further, BellSouth contends that there is no limit to the number of CLECs that participate in CCP and there is no limit to the number of change requests any ALEC may make of BellSouth. Further, BellSouth argues that no company has unlimited resources, and no ILEC, to BellSouth's knowledge, is subject to a Change Control Process by which ALECs determine the level of OSS investment that the incumbent must make.

CHANGE REQUEST METRICS

To compete, especially beyond the footprint of any one ILEC, ALECs need similar functionalities for pre-ordering, ordering, billing, repair and maintenance systems. A case in point is Parsed Customer Service Records, which was effectuated by all other RBOCs well before BellSouth made it available under mandate from the Florida and Georgia Commissions. We note that BellSouth actively resisted implementation of Parsed Customer Service Records, an ALEC-initiated change request, for reasons of cost for over two years.

We observe that at least 19 ALEC-initiated change requests within the backlog were filed two to three years ago. None of those requests has been rejected by BellSouth for cost or technical reasons. We consider that lag to be an unreasonable delay for ALECs wishing to proceed with marketing plans and/or achieve efficiencies that are used in other ILEC territories.

Under these metrics, BellSouth retains the ability to reject an ALEC-initiated change request for reasons stated within the CCP document. There are three stated reasons for rejection: cost, industry direction, and technical feasibility. The latter two reasons are technically based and are typically easily resolved in discussion between ALEC and BellSouth technical experts. The first reason, cost, is quite subjective and can be used by BellSouth to

reject any ALEC-initiated change request. BellSouth can still control ALEC-initiated demands for new software features by using the stated reason of cost. However, we note that, according to the CCP document, BellSouth must provide ALECs its rationale for decisions made on a cost basis, and that decision is appealable. Rejections are appealable both through escalations within BellSouth and through filing a complaint with a regulatory body.

These additional metrics are needed to address timeliness concerns. Because of the current CCP backlog a 60-week implementation benchmark is necessary to ensure timely adoption of change requests. Measuring the percent change request rejected and the percent rejected within 10 days provides information regarding BellSouth's acceptance of ALEC input and timeliness of its action.

BellSouth shall implement the metric Percent of Change Requests Implemented Within 60 Weeks of Prioritization (Attachment 1). Additionally, BellSouth shall file a specific action plan on August 30, 2002, on how it proposes to accomplish the stated benchmark. Further, BellSouth shall be ordered to establish two additional metrics: Percent Change Requests Rejected and Percent of Change Requests Accepted or Rejected Within 10 Business Days (Attachments 2 and 3).

DUE DATE FOR TIER 1 AND TIER 2 PAYMENTS

There is an internal conflict between BellSouth's Service Quality Measurement Plan and the SEEM Administrative Plan regarding the due date of Tier 1 and Tier 2 payments for failure to meet the prescribed performance standards.

As stated currently in Section 4.4.1 of the SEEM Administrative Plan, payments are due "by the <u>end</u> of the second month following the month for which disparate treatment was detected." We find that the due date shall be changed to the <u>15th day</u> of the month to coincide with the payment due date cited in BellSouth's Service Quality Measurement Plan.

In addition to resolving the internal inconsistency, changing the payment due date to the 15th of the month would coincide with the date payments are made under BellSouth's SEEM plan in effect for Georgia, Kentucky, and Louisiana. This would provide BellSouth

with a more efficient way of administering and monitoring its SEEM plan in all four states.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that effective September 1, 2002, BellSouth Telecommunications, Inc. shall implement the metric entitled Percent of Change Requests Implemented Within 60 weeks of Prioritization, described in Attachment 1, which is attached hereto and incorporated herein by reference. It is further

ORDERED that BellSouth Telecommunications, Inc. shall file a specific action plan by August 30, 2002, on how it proposes to accomplish the metrics established by this Order. It is further

ORDERED that effective September 1, 2002, BellSouth Telecommunications, Inc. shall implement the metric entitled Percent Change Requests Rejected, described in Attachment 2, which is attached hereto and incorporated herein by reference. It is further

ORDERED that effective September 1, 2002, BellSouth Telecommunications, Inc. shall implement the metric entitled Percent of Change Requests Accepted or Rejected Within 10 Business Days, described in Attachment 3, which is attached hereto and incorporated herein by reference. It is further

CRDERED that BellSouth Telecommunications, Inc. shall revise Section 4.4.1 of the SEEM Administrative Plan to require Tier 1 and Tier 2 payments be made by the 15th day of the second month following the month for which disparate treatment was detected. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth

in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event a protest is filed, the resolution of the protest shall be addressed during the six-month review process. It is further

ORDERED that in the event this Order becomes final, this docket shall remain open.

By ORDER of the Florida Public Service Commission this 9th Day of August, 2002.

BLANCA S. BAYÓ, Director

Division of the Commission

and Administrative Services

(SEAL)

JKF

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on August 30, 2002.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

ATTACHMENT 1

Percent of Change Requests Implemented Within 60 Weeks of Prioritization

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

Change requests that are implemented later than 60 weeks with the consent of the CLECs. Change Requests for which BellSouth has regulatory authority to exceed the interval.

Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of measure.

Calculation

Percent of Type 5 CLEC-initiated Change Requests implemented on time = (a + b) x 100

- a = Total number of prioritized Type 5 CLEC initiated Change Request, that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization

Percent of Type 4 BellSouth-initiated Change Requests implemented on time = (a + b) x 100

- a = Total number of prioritized Type 4 BellSouth-initiated Change Request, that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth-initiated Change Requests from the date of the release prioritization list

Report Structure

- BellSouth Aggregate
- Type 4s implemented
- Type 5s implemented
- % implemented within 16, 32, 48, and 60 weeks

Data Retained

Region
Report Month
Total Implemented, by type
Total Implemented within 60 weeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	95% within interval
Type 4s implemented	95% within interval
Type 5s implemented	95% within interval

SEEM Measure

SEEM	Measure
Tier I	
Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Region	95% within interval

ATTACHMENT 2

Percent Change Requests Rejected

Definition

Measures the percent of Change Requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected based on the reasons specified per the Change Control Process within the report period.

Exclusions

 Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at

http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to above exclusions, not just those received and rejected in the same reporting period.

Calculation

Percent Change Requests Rejected = (a ÷ b) x 100

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

Data Retained

- Report Period
- Requests Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	Diagnostic
Reason - Cost	
Reason – Technical Feasibility	
Reason – Industry Direction	

SEEM Measure

	SEEM	Measure
	Tier I	
No	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

ATTACHMENT 3

Percent of Change Requests Accepted or Rejected Within 10 days

Definition

Measures the percent of Change Requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

Exclusions

• Change Requests that are canceled or withdrawn before a response from BellSouth is

Business Rules

The Acceptance/Rejection interval starts when the acknowledgment is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = (a + b) x 100

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

Report Structure

BellSouth Aggregate

Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Region	95% within interval

SEEM Measure

SEEM	Measure
Tier I	
Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Region	95% within interval

State of Florida



Public Service Commission -M-E-M-O-R-A-N-D-U-M-

DATE: October 22, 2002

All Parties of Record TO:

FROM: Linda H. Dodson, Attorney, Office of the General Counsel Docket No. 000121A Six Month Review of BellSouth Performance Assessment Plan

The attached list of proposed changes to the SQM plan for Docket No. 000121A has been agreed to at workshops held on September 25 and 26, 2002, and October 17 and 18, 2002. Please file comments by November 1, 2002, confirming your agreement to the issues on the list. Any issue to which you believe agreement has not been reached should be noted in your comments. Any such issues will be moved to the Disputed Issues list and all parties should comment appropriately.

If you have further questions about this memorandum or the attached list, please contact Linda H. Dodson at (850) 413-6216 or Carl Vinson at (850) 413-6812.

LHD

cc: Division of Competitive Markets and Enforcement

FPSC-COMMISSION CLERK

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
1	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes
2	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Retail Usage of LENS	Yes
4	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Exclusion - Add language addressing trouble caused by outside BST control	Yes
5	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Exclusion - Degraded service outage and scheduled maintenance	Yes
6	BST	Pg 5, 8/30 Filing	OSS-2	ADD: <u>Business Rule</u> - Add the words "loss of functionality" to the measure.	Yes
7	BST	Pg 5, 8/30 Filing	OSS-2	ADD: <u>Disaggregation</u> - Add "per OSS interface" to the Regional level of Disaggregation.	Yes
8	BST	Pg 5, 8/30 Filing	0-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes
9	BST	Pg 6, 3/30 Filing	0-1	ADD: <u>Calculation</u> - Add the words "for returned acknowledgements" to the sum of all response interval in numerator.	Yes
10	BST	Pg 6, 8/30 Filing	0-1	Calculation - Change denominator to include acknowledgement notices returned in reporting period.	Yes
11	BST	Pg 6, 8/30 Filing	O-2	MODIFY: Benchmark - From 100% to 99.5% for TAG	Yes
12	BST	Pg 6, 8/30 Filing	0-3	ADD: Exclusion - Scheduled OSS Maintenance	Yes
13	BST	Pg 7, 8/30 Filing	LSR Flow- Through Matrix	DELETE: Remove LSR Flow-Through Matrix from the SQM Agreement reached at workshop not to delete, but to include an "as of date"	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
14	BST	Pg 7, 8/30 Filing	LSR Flow- Through Matrix	ADD: SQM directions for locating the latest version of the Flow-Through Matrix on PMAP	Yes
18	BST	Pg 9, 8/30 Filing	P-2	SPLIT MEASUREMENT: P-2A - Jeopardy Notice Interval P-2B - % of Orders Given Jeopardy Notices	Yes
20	BST	Pg 9, 8/30 Filing	P-2	ADD: <u>Exclusion to P-2A</u> - Orders issued with a due date of 48 hours of less.	Yes
25	BST	Pg 12, 8/30 Filing	P-12	DELETE: Eliminate measurement P-12 (LNP-Avg Disconnect Timeliness Intvl & Disconnect Timeliness Intvl Dist)	Yes
26	BST	Pg 12, 8/30 Filing	P-13B P-13C	ADD: P-13B (LNP-Avg Time Out of Svee for LNP Conversions) and P-13C (LNP-% of Time BST Applies the 10-digit Trigger Prior to the LNP Order Due Date) Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.	Yes
.27	BST	Pg 15, 8/30 Filing	B-4, B-5, B-6	MODIFY BENCHMARK: BST propuses benchmarks be adopted for these three billing measures, rather than retail analogs	Yes
28	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: Exclusion - 1)trunk groups blocked due to ALEC network/equipment failure	Yes
31	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: Exclusion - 4)final groups actually overflowing, not blocked	Yes
33	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	MODIFY BUSINESS RULES: Categorie 1, 10 & 16 are all "BST affecting" and should be added to the "BST affecting categories"	Yes
34	BST	Pg 17, 8/30 Filing	C-2	MODIFY BUSINESS RULE: Define the end time as the time when BST notifies the ALEC, not when the ALEC accepts the arrangement.	Yes
	1			SQM Changes-Exhibit 3	

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
1	BST	Exhibit 3	Intro- duction	In the 4th paragraph of the Introduction section of the SQMP, change "This document is intended for use by someone with knowledge of the telecommunication industry,"	Yes
2	BST	Exhibit 3	Intro- duction	In the 5th paragraph of the Introduction section of the SQMP, change: "Once it is approved, the most current copy of this document can be found on the web at URL: https://pmap.bellsouth.com in the Help Documentation Downloads folder.	Yes
4	BST	Exhibit 3	OSS-1	In the Business Rules, change the phrase: "when the appropriate response is returned to the client application" to "when the appropriate response is received by the client application."	Yes
5	BST	Exhibit 3	OSS-1	In the Business Rules, add the following sentence: BST will not schedule maintenance during the hours from 8:00 am until 9:00 pm. Monday through Friday.	Yes
6	BST	Exhibit 3	OSS-1	In the Calculation, add the following formula: % within interval=(e/f) X 100 e=Sum of Response Time for Interval f=# of Legacy Requests During the Reporting Period for System "for which a response was provided"	Yes
7	BST	Exhibit 3	OSS-1	Delete the OASISCAR, OASISLPC, and CASISMTN from the Legacy System Access Times table.	Yes
8	BST	Exhibit 3	OSS-2	Change the title and calculation of this measure from "Interface Availability" to "OSS Availability"	Yes
9	BST	Exhibit 3	OSS-3	Change the title and calculation of this measure from "Interface Availability" to "OSS Availability"	Yes
11	BST	Exhibit 3	OSS-3	Calculation change: OSS Availability (a/b) x 100 a=Functional Availability of front end systems b= Scheduled Availability of front end systems Agreement reached at workshop to delete reference to "front end systems"	Yes
12	BST	Exhibit 3	OSS-3	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, per OSS interface"."	Yes

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riginal No.	Рторовет	Reference	Metric	Proposal	Parties Agree:
3	BST	Exhibit 3	OSS-3	Move the OSS Interface Availability and the SEEM OSS Interface Availability to Appendix C and change the OSS Interface "LNP" to "LNP Gateway".	Yes
4	BST	Exhibit 3	OSS-4	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, Per OSS Interface."	Yes
	BST	Exhibit 3	PO-2	Business Rules-Delete references to "RoboTAG".	Yes
16	BST	Exhibit 3	PO-2	Changes to Data Retained: Relation to CLEC Experience Report Month Legacy Contract Response Interval Regional Scope Total Number of Inquiries SI Interval State and Region	Yes
17	BST	Exhibit 3	O-9	Definition change: Interval for Return of a FOC Interval is the average response time from receipt of a valid LSR or ASR to distribution of a FOC. The interval will include an electronic facilities check.	Yes
19	BST	Exhibit 3	P-1	Changes to Exclusions: Orders with appeart code of "A" for Rural orders. Orders with an Appeart Code of "A", i.e. orders for locations requiring special construction including locations where no address exists and a technician must make a field visit to determine how to get facilities to the location.	Yes
22	BST	Exhibit 3	P-3	Change to Exclusions: Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) Order types may be coded C, N, R, or T.	Yes
23	BST	Exhibit 3	P-3	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes
26	BST	Exhibit 3	P-3A	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree		
29	BST	Exhibit 3	P-4	Change to Report Structure: Residence & Business reported in day intervals 0,1,2,3,4,5,5+ ISDN Orders included in Non-Design	Yes		
31	BST	Exhibit 3	P-4	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes		
32	BST	Exhibit 3	P-4A	Change to Business Rules: The interval breakout for UNE is: 1,2,3,4,5+ and Design is: 0-5,>510,>10-<-15,>15-<-20,>20- <-25,>25-<=30,>30 0-5-0,<5,5-10-5,<10,10-15-10,<15,15-20-15, <-20,20-25-20,<25,25-30-25,<30,>-30-30 and greater	Yes		
33	BST	Exhibit 3	P-4A	Change to Report Structure: Residence & Business reported in day intervals = 0,1,2,3,4,5,5+ UNE and Design reported in day intervals = 0.5,5-10,10-15,15-20,20-25,25-30,>-30 0- <=5,>5<=10,>10-<=15,>15-<=20,>20- <=25,>25+30,>30 ISDN Orders included in Non-Design Geographic Scope State	Yes		
35	BST	Exhibit 3	P-4A	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>—DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes		
36	BST	Exhibit 3	P-5	Business Rule Change: For non mechanized orders the end time will be date and timestamp of order update from the FAX record via LON or C SOTS system. For the retail analog, the start time is when the technician completes the order and the end time is when the order status is changed to complete in SOCS. Agreement reached at workshop to delete strikeout of first sentence and include the language.	Yes		

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Original	Proposer	Reference	Metric	Proposal	Parties Agree
37	BST	Exhibit 3	P-5	Report Structure Change: Reporting intervals in Hours; 0, 1-<=2.>2-4.>4- <=8.>8-<=12.>12-<=24.>24 plus Overall Average Hour Interval 1-2.2-4,4-6,8-12,12-24 plus Overall Average Hour Interval (The categories are inclusive of these time intervals; 0-1-0-0.99;1-2-1-1.99; 2-4+2-3.99, etc.)	Yes
39	BST	Exhibit 3	P-5	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes
41	BST	Exhibit 3	P-7A	Business Rule Change: 1. DST performs the hot cut, notifies the CLEC by telephone: 2. DST performs the hot cut and attempts to notify the CLEC by telephone, but receives no answer and leaves a phone message:	Yes
43	BST	Exhibit 3	P-7B	Calculation Change: Average Recovery Time=(c/d) c-Sum of all the Recovery Times d=# of Troubles per circuit Referred to BST	Yes
46	BST	Exhibit 3	P-8	Change the Title of this measure by replacing the word "Tested" with the phrase "Passing Cooperative Testing".	Yes
47	BST	Exhibit 3	P-8	Definition Change: A loop will be considered successfully cooperatively tested when both the CLEC and H.EC BST representatives agree that the loop has passed the cooperative testing meets the technical specifications set forth in TR 73600.	Yes
49	BST	Exhibit 3	P-9	Business Rule Change: Measures the quality and accuracy of completed orders. The first trouble report from a received after service order after completion is counted in this measure.	Yes
52	BST	Exhibit 3	M&R-1	Definition Change: The percent of <u>customer</u> trouble reports not cleared by the committed date and time.	Yes

MEMORANDUM

DOCKET NO. 000121A

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
53	BST	Exhibit 3	M&R-1	Calculation Change: % of Missed Repair Appts=(a/b) x 100 a=Count of Customer Troubles Not Cleared by the Quoted Commitment Date and Time b=Total Customer Trouble reports closed in Reporting Period	Yes
55	BST	Exhibit 3	M&R-2	Definition Change: Initial and repeated customer direct or referred customer troubles reported within a calendar month per 100 lines/circuits in service.	Yes
56	BST	Exhibit 3	M&R-2	Calculation Change: a=Count of Initial and Repeated Customer Trouble Reports closed in the Current period b=Number of Service Access Lines in service at End of the Report Period	Yes
58	BST	Exhibit 3	M&R-3	Calculation Change: Maintenance Duration=(a-b) a=Date and Time of Service Restoration b=Date and Time <u>Customer</u> Trouble Ticket was Opened Avg Maintenance Duration=(c/d) c=Total of all maint durations in the reporting period d=Total Closed <u>Customer</u> Troubles in the reporting period	Ycs
60	BST	Exhibit 3	M&R-4	Definition Change: Closed customer trouble reports on the same line/circuit as a previous customer trouble report received within 30 calendar days as a percent of total customer troubles closed reported.	Yes
61	BST	Exhibit 3	M&R-4	Calculation Change: % Repeat <u>Customer</u> Troubles within 30 Days- (a/b)x100 a=Count of closed Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days. B=Total <u>Customer</u> Trouble Reports Closed in Reporting Period.	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties · Agree
52	BST	Exhibit 3	M&R-4	Data Retained Change: Relating to CLEC Experience: Total and % Repeat <u>Customer</u> Trouble Reports within 30 Days (TOT_REPEAT) Relating to BST Performance Total and % Repeat <u>Customer</u> Trouble Reports within 30 Days	Yes
64	BST	Exhibit 3	M&R-5	Definition Change: For Out of Service <u>Customer</u> Troubles (no dial tone, cannot be called or cannot call out (the percentage of Total OSS <u>Customer</u> Troubles cleared in excess of 24 hours (All design services are considered to be out of service).	Yes
65	BST	Exhibit 3	M&R-5	Business Rule Change: Customer Trouble reports that are out of service and cleared in excess of 24 hours. The clock begins when the customer trouble report is created in LMOS/WFA and the customer trouble is counted if the elapsed time exceeds 24 hours.	Yes
66	BST	Exhibit 3	M&R-5	Calculation Change: Out of Service (OOS)>24 Hours=(a/b) x 100 a=Total Cleared <u>Customer</u> Troubles OOS>24 Hours b=Total OOS <u>Customer</u> Troubles in Reporting Period	Yes
68	BST	Exhibit 3	M&R-6	Definition Change: This report measures the average time a customer is in queue when calling a BST Repair Center.	Yes
69	BST	Exhibit 3	B-1	Calculation Change: Invoice Accuracy=[(a-b)/a x 100) a=Absolute Value of Total Billing Revenues during current month b=Absolute Value of <u>Total</u> Billing Related Adjustments during current month.	Yes
70	BST	Exhibit 3	B-1	Report Structure Change: Number of Adjustments	Yes
71	BST	Exhibit 3	B-1	Data Retained Change: Change the phrase "Billing Related Adjustments" to "Total Billing Related Adjustments" for both CLEC Experience and BST Performance.	Yes
72	BST	Exhibit 3	B-2	Definition Change	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
73	BST	Exhibit 3	B-2	Business Rule Change	Yes
74	BST	Exhibit 3	B-2	SQM Analog/Benchmark Change: CRIS based invoices will be released for delivery within 6 business days; CRIS based invoices will be released for delivery within 8 calendar days; CLEC Avg Delivery Intervals for both CRIS and CABS Invoices are comparable to BST Avg delivery for both systems.	Yes
75	BST	Exhibit 3	B-4	Report Structure Change: Remove "BellSouth Aggregate".	Yes
76	BST	Exhibit 3	B-4	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
77	BST	Exhibit 3	B-5	Report Structure Change: Remove "BellSouth Aggregate".	Yes
78	BST	Exhibit 3	B-5	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
79	BST	Exhibit 3	B-6	Report Structure Change: Remove "BellSouth Aggregate".	Yes
80	BST	Exhibit 3	B-6	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
81	BST	Exhibit 3	В-7	Business Rule Change: Add sentence: The count of fractional recurring charges in the calculation refers to a sum of absolute total dollar values either billed on the correct bill or the absolute value of total fractional recurring charges on the bill. Agreement reached at workshop to delete the word "correct" from the denominator.	Yes
82	BST	Exhibit 3	B-8	Business Rule Change: Add sentence: The count of non-recurring charges in the calculation refers to a sum of absolute total dollar values wither billed on the correct bill or the absolute value of total non-recurring charges on the bill.	Ycs

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
83	BST	Exhibit 3	B-10	Title, Calculation, and Data Retained Change: Inserting "Business" before "Days".	Yes
85	BST	Exhibit 3	C-1	Definition Change: Measures the avg time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of app fee if required) to the date BST returns a response electronically or in writing. Within 10 the number of calendar days as designated by the Collocation Order after having received a bona fide application for physical collocation, BST must respond as to whether space is available or not with space availability and a price quote.	Yes
86	BST	Exhibit 3	C-2	SQM Analog/Benchmark Change: Virtual-Augment-45 60 Calendar Days (Without Space Increase).	Yes
87	BST	Exhibit 3	CM-3	Definition Change: Measures whether CLECs received requirements or business rule documentation on time to prepare for BST interface/system changes so CLEC interfaces are not impaired by change as set forth in the Change Control Process governed by the CLEC/DST Review Board:	Yes
88	BST	Exhibit 3	CM-3	Business Rule Change: This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames set forth in the Change Control Process a copy of which can be found at http://www.intercomection.bellsouth.com/markets/lec/cp_live/index.html . The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.	Yes
89	BST	Exhibit 3	CM-9	Calculation Change: The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects, without a mechanized work around:	Yes

TABLE OF A GREED ISSUES FIGRIC BEIl South Performance Assessment Planages Six Montingeries as of October 22, 2002

Original	Proposer	Reference	Metric	Proposal	Parties
No.					Agree
3	BST	Exhibit 3	Report Pub Dates	In the last sentence of this section, change: ABST shall retail the performance measurement raw data files Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of 3 years.	Delete
20	BST	Exhibit 3	P-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
21	BST	Exhibit 3	P-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
24	BST	Exhibit 3	P-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
27	BST	Exhibit 3	P-3A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
30	BST	Exhibit 3	P-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
34	BST	Exhibit 3	P-4A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
38	BST	Exhibit 3	P-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

Florida BellSouth Performance Assessment Plan

Six Month Review as of October 22, 2002

Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
40	BST	Exhibit 3	P-7	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
42	BST	Exhibit 3	P-7A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
44	BST	Exhibit 3	P-7B	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
45	BST	Exhibit 3	P-7C	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
48	BST	Exhibit 3	P-8	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
50	BST	Exhibit 3	P-9	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
51	BST	Exhibit 3	P-10	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
54	BST	Exhibit 3	M&R-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

TABLE OF AGREED ISSUES Florida Bell South Performance Assessment Plan Six Month Review as of October 22, 2002.

Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
57	BST	Exhibit 3	M&R-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
59	BST	Exhibit 3	M&R-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
63	BST	Exhibit 3	M&R-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
67	BST	Exhibit 3	M&R-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
84	BST	Exhibit 3	DUI-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

		\$ 3 (5) s	: 354 <u>48</u> exista!(8	MONTALEMENT SALES MASS TERMINANT CASSAMENTER STANDONE THE TERMINANT SALES	
Original	Proposer	Ref	Metric	Proposal	Parties Agree
11	ALEC	Pg 8, 8/30 Filing	PO-1	ADD to Tier 1	Yes
12	ALEC	Pg 8, 8/30 Filing	PO-2	ADD to Tier 1	Yes
14	ALEC	Pg 8, 8/30 Filing	ADM	Independent SEEM audit is necessary. ALECs want audit of BST's PARIS reports to ensure the remedy pmts are accurate.	Yes
25	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Tier I Metric	Yes
26	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Calc Remedy Amt on Web Site	Yes
27	ALEC	Pg 10, 8/30 Filing	PARiS	ADD: Report w/info for each submeasure on a monthly basis Adjustment	Yes
28	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Restated Remedy Calculation	Yes
35	ALEC	Pg 16, 8/30 Filing	NEW SQM	ADD: SOM - % of Time BST Applies the 10 Digit Trigger Prior to the LNP Order Due Date; % Out of Service<60 Minutes; and LNP Avg Disconnects Timeliness Intvl & Disconnect Timeliness Intvl Dist (Non-Trigger) Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.	Yes

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DOCKET NO. 000121A

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Original	Proposes	Ref	Metric .	Proposal	Parties Agree
3	ALEC	PG 6, ALEC Modified Redline	OSS-2	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
5	ALEC	PG 8, ALEC Modified Redline	OSS-3	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
6	ALEC	PG 10, ALEC Modified Redline	OSS-4	MODIFY: Disagg to include Appendix D. Agreement reached at workshop that BST will add "footnote of key".	Yes
7	ALEC	PG 15, ALEC Modified Redline	0-1	MODIFY: Calculation of "c" and "d".	Yes
15	ALEC	PG 35, ALEC Modified Redline	0-9	MODIFY: Change exclusion "LCSC" to "center(s)".	Yes
25	ALEC	PG 46, ALEC Modified Redline	P-1	MODIFY: Calculation-replace"for the reporting period" with "from the earliest BST missed appt".	Yes
42	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comment s)	MODIFY: Business Rules-Replace "transmitted" with "delivered".	Yes
43	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comment 8)	ADD: Business Rules-For the retail analogue, the start time is when the technician completes the order and the end time is when the order status is changed to complete in SOCs.	Yes
51	ALEC	PG 77, ALEC Modified Redline	P-8	MODIFY: Definition-replace "has passed the cooperative testing" replace with "meets the technical specifications set forth in TR73600".	Yes
71	ALEC	PG 107, ALEC Modified Redline	M&R-7	MODIFY: Definition Replace "key customer accounts" with "customer impacting".	Yes

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Original	Proposet	Ref	Metric	Proposal	Parties Agree			
72	ALEC	PG 113, ALEC Modified Redline	B-3	ADD: SEEM - Add to Tier I.	Yes			
82	ALEC	PG 127, ALEC Modified Redline	B-10	ADD: Calculation - Add "responses due"	Yes			
85	ALEC	PG 133, ALEC Modified Redline	DUI-1	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes			
87	ALEC	PG 135, ALEC Modified Redline	DUI-2	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes			

Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002

			8	s of October 22, 2002	
Original #	Proposer	Ref	Metric	Proposal	Parties Agree
1	ALEC	Pg 2, 8/30 Filing		ADD to SEEM: Severity component	Delete (from this forum only)
18	ALEC	PG 40, ALEC Modified Redline	O-10	ALECs willing to defer SEEM measure until next review.	Delete
29	ALEC	PG 52, ALEC Modified Redline	NEW SQM P-3	ADD: SQM for Percent Missed Initial Installation Appointments	Delete
37	ALEC	PG 58, ALEC Modified Redline	NEW SQM P-4	ADD: SQM for Average Completion Interval (OCI) & Order Completion Interval Distribution	Delete
46	ALEC	PG 68, ALEC Modified Redline	P-6	SEEM: ALECs willing to defer until next review.	Delete
49	ALEC	PG 74, ALEC Modified Redline	P-7B	SEEM: ALECs willing to defer until next review.	Delete
62	ALEC	PG 89, ALEC Modified Redline	P-12	ADD: Business Rules-AThe disconnect activity will be performed before the order is completed in SOCs@	Delete
63	ALEC	PG 90, ALEC Modified Redline	P-12	MODIFY; SQM Disagg-Needs to be discussed in context of new LNP measures.	Delete
70	ALEC	PG 106, ALEC Modified Redline	M&R-6	SEEM: ALECs willing to defer until next review.	Delete
73	ALEC	PG 116, ALEC	B-4	SEEM:	Delete

Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002

Original	Proposer	Ref	Metric	Proposal	Parties Agree
#		Modified Redline		ALECs willing to defer until next review.	
76	ALEC	PG 120, ALEC Modified Redline	B-6	SEEM: ALECs willing to defer until next review.	Delete
77	ALEC	PG 121, ALEC Modified Redline	В-7	SEEM: ALECs willing to defer until next review.	Delete
78	ALEC	PG 124, ALEC Modified Redline	B-8	SEEM: ALECs willing to defer until next review.	Delete
79	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace ARegion@ with AState@	Delete
80	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace ADiagnostic@ with A95% within interval@	Delete
81	ALEC	PG i26, ALEC Modified Redline	В-9	ADD: SEEM - Add to Tier I and Tier II.	Delete
86	ALEC	PG 134, ALEC Modified Redline	DUI-1	SEEM: ALECs willing to defer until next review.	Delete
88	ALEC	PG 136, ALEC Modified Redline	DUI-2	SEEM: ALECs willing to defer until next review.	Delete
89	ALEC	PG 138, ALEC Modified Redline	DUI-3	SEEM: ALECs willing to defer until next review.	Delete

Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002

as of October 22, 2002								
Original #	Proposer	Ref	Metric	Proposal	Parties Agree			
96	ALEC	PG 149, ALEC Modified Redline	C-1	SEEM: ALECs willing to defer until next review.	Delete			
97	ALEC	PG 151, ALEC Modified Redline	C-2	SEEM: ALECs willing to defer until next review.	Delete			
103	ALEC	PG 158, ALEC Modified Redline	CM-5	SEEM: ALECs willing to defer until next review.	Delete			

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (BELLSOUTH TRACK)

DOCKET NO. 000121A-TP ORDER NO. PSC-02-1736-PAA-TP ISSUED: December 10, 2002

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman J. TERRY DEASON BRAULIO L. BAEZ MICHAEL A. PALECKI RUDOLPH "RUDY" BRADLEY

NOTICE OF PROPOSED AGENCY ACTION ORDER IMPLEMENTING PROPOSED REVISIONS TO THE PERFORMANCE ASSESSMENT PLAN

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

I. Case Background

We opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of operations support systems (OSS) provided by incumbent local exchange carriers (ILECs) for use by alternative local exchange carriers' (ALECs). A monitoring and enforcement program to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS is associated with the performance metrics. Performance monitoring is necessary to ensure

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that ILECs are meeting their obligation to provide unbundled access, interconnection and resale to ALECs in a nondiscriminatory manner. Additionally, it establishes a standard against which ALECs and this Commission can measure performance over time to detect and correct any degradation of service provided to ALECs.

Docket No. 000121-TP consists of three phases. Phase I began with workshops conducted with members of the ALEC and ILEC communities. These workshops were held on March 30, 2000, August 8, 2000, and December 13, 2000. The purpose of Phase I was to determine and resolve any policy and legal issues in this matter. Phase II involved establishing permanent metrics for BellSouth Telecommunications, Inc. (BellSouth), including a specific monitoring and enforcement program. With the completion of Phase II, we are beginning Phase III of this docket, which entails the establishment of performance metrics and a performance monitoring and evaluation program for the other Florida ILECs.

By Order No. PSC-01-1819-FOF-TP (Final Order), issued September 10, 2001, we established permanent performance measures and benchmarks as well as a voluntary self-executing enforcement mechanism (Performance Assessment Plan) for BellSouth. By Order No. PSC-02-0187-FOF-TP, issued February 12, 2002, as amended by Order No. PSC-01-0187A-FOF-TP, issued March 13, 2002, BellSouth's Performance Assessment Plan was approved.

By Order No. PSC-02-0503-PCO-TP, issued April 11, 2002, Docket No. 000121-TP was divided into three subdockets: (1) 000121A-TP, in which filings directed toward the BellSouth track would be placed; (2) 000121B-TP, in which filings directed toward the Sprint track would be placed; and (3) 000121C-TP, in which filings directed toward the Verizon track would be placed.

By Order No. PSC-02-0989-PAA-TP, issued July 22, 2002, BellSouth was required to file a specific action plan designed to improve flow-through and adjust the Self Effectuating Enforcement Mechanism (SEEM) for the flow-through metric by July 30, 2002, for the August 2002 results. Additionally, BellSouth was ordered to establish defect correction metrics to be effective August 1, 2002, as part of the Service Quality Measures in Docket 000121A-TP.

By Order No. PSC-02-1094-PAA-TP, issued August 9, 2002, BellSouth was required to implement three new Service Quality Measures to address concerns over the timely and effective implementation of ALEC-initiated change requests for new features. Additionally, BellSouth was ordered to change the required due date for Tier 1 and Tier 2 SEEM payments.

This Order addresses proposed changes to BellSouth's Performance Assessment Plan in conjunction with our six-month review process set forth in Order No. PSC-02-0187-FOF-TP in Docket 000121A-TP. The six-month review process consisted of a collaborative work group, which included BellSouth, interested ALECs, and the Commission. The group reviewed the Performance Assessment Plan for additions, deletions and other modifications.

We are vested with jurisdiction over this matter pursuant to Sections 364.01(3) and (4)(g), Florida Statutes. Pursuant to Section 364.01(3), Florida Statutes, the Florida legislature has found that regulatory oversight is necessary for the development of fair and effective competition in the telecommunications industry. To that end, Section 364.01(4)(g), Florida Statutes, provides, in part, that we shall exercise our exclusive jurisdiction in order to ensure that all providers of telecommunications service are treated fairly by preventing anticompetitive behavior. Furthermore, it is noted that the FCC has encouraged the states to implement performance metrics and oversight for purposes of evaluating the status of competition under the Telecommunications Act of 1996.

II. Analysis

The Service Quality Measurement Plan describes in detail the measurements produced by BellSouth in order to evaluate the quality of service delivered to both wholesale and retail BellSouth customers. The major measurement categories are: preordering, ordering, provisioning, maintenance and repair, and billing. In addition, the following categories are also included: operator services and directory assistance, database information, E911, trunk group performance, collocation, and change management.

BellSouth's SEEM Plan, as approved in Order No. PSC-01-1819-FOF-TP, describes in detail the means by which enforcement will be determined. This includes the appropriate level of performance

measurement disaggregation for compliance reporting and the statistical methodology to be used to compare retail to wholesale performance for determination of penalties and payments.

As part of Order No. PSC-01-1819-FOF-TP, the parties stipulated that, within the first two years of implementation, BellSouth will participate in six-month review cycles to discuss any proposed changes to the Performance Assessment Plan. On September 25-26, 2002 and October 17-18, 2002, the first six-month review workshops were held to gauge the effectiveness of BellSouth's permanent performance measures and to determine whether the current remedy structure is effective in driving BellSouth's performance toward the required standards. The proposed changes to the remedy structure of the SEEM plan will be addressed at a future time.

In response to the parties' workshop comments concerning the proposed changes to the permanent performance measures, two separate tables were developed: 1) One that lists proposed changes to the performance measures that were agreed upon by the parties, and 2) One that lists proposed changes to the performance measures that were not agreed upon by the parties. The parties were requested to file respective comments in regards to both tables.

This order addresses the proposed changes to BellSouth's Performance Assessment Plan on which the participating parties agreed. The parties' comments on the proposed changes to the performance measures that were not agreed upon are due on December 12, 2002, and will be addressed at a later date.

Attachment 1, incorporated herein by reference, is a table listing the proposed changes to the performance measures that were agreed upon by the parties. The table is divided into four columns which identify:

- The party proposing the change,
- The performance measurement being changed,
- The proposed change to the performance measurement, and
- The parties' confirmation of the proposed change.

Measures 92 through 112 and 135 through 156 in Attachment 1 represent proposed changes that the parties agreed to be deleted from this six-month review cycle.

As a part of the Operation Support System test, BearingPoint Consulting (formerly KPMG Consulting) was required to conduct an independent assessment of the adequacy of BellSouth's permanent performance measures. This assessment, known as the Adequacy Study, filed in Docket 000121A-TP in September 2002, details documentation ambiguities (red-line changes) in the performance measures as well as recommended changes to the structure of the Service Quality Measures. As part of this docket, the parties were requested to file comments on the Adequacy Study. Attachment 2, incorporated herein by reference, reflects documentation or red-line changes to the performance measures noted in the Adequacy Study that were agreed upon by the parties.

ALEC Comments

In the ALEC Coalition's comments concerning the proposed table of agreed upon issues, the ALEC Coalition acknowledged that the table accurately states the issues upon which the parties agreed. However, in its comments, the ALEC Coalition clarified that for item numbers 55 through 66 listed in Attachment 1, their agreement to the addition of the word "customer" in the proposed changes would not result in the exclusion of "no trouble found" or "found OK/test OK" situations.

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BellSouth Comments

In BellSouth's comments concerning the proposed table of agreed issues, BellSouth concurred with the assessment of all the issues proposed in the table with the exception of a proposed change that was inadvertently listed as in agreement by the parties. The change was a modification to an exclusion to the Firm Order Confirmation Timeliness Measure (0-9). The proposed change has been removed from Attachment 1 and will be addressed with other proposed changes to the performance measures that were not agreed upon in a future recommendation.

After consideration of the proposed changes, we order that BellSouth shall implement the revisions to the Performance Assessment Plan contained in Attachments 1 and 2 of this Order and

agreed to by the parties in the six-month review process, with the ALEC clarification that for item numbers 55 through 66, ALEC agreement to the addition of the word "customer" in the proposed changes will not result in the exclusion of "no trouble found" or "found OK/test OK" situations.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that BellSouth Telecommunications, Inc. shall implement the revisions to the Performance Assessment Plan set forth in Attachments 1 and 2 to this Order, which are attached and incorporated, with the herein clarification that for item numbers 55 through 66, the ALECs' agreement to the addition of the word "customer" in the proposed changes will not result in the exclusion of "no trouble found" or "found OK/test OK" situations. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event a protest is filed, the resolution of the protest shall be addressed during the six-month review process. It is further

ORDERED that in the event this Order becomes final, this docket shall remain open.

By ORDER of the Florida Public Service Commission this 10th day of December, 2002.

BLANCA S. BAYÓ, Director

Division of the Commission Clerk and Administrative Services

(SEAL)

LHD

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of

the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on <u>December 31, 2002</u>.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period. PSC-02-1736-PAA-TP DOCKET NO. 000121A-TP PAGE 9

ATTACHMENT 1 DOCKET NO. 000121A-TP

TABLE OF AGREED ISSUES Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002								
Original	Propeser	Religions.	Metric	Proposal	Parties Agree			
1	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes			
2	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Retail Usage of LENS	Yes			
3	BST	Pg 5, 8/30 Filing	OSS-2	ADD: <u>Exclusion</u> - Add language addressing trouble caused by outside BST control	Yes			
4	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Exclusion - Degraded service outage and scheduled maintenance	Yes			
5	BST	Pg 5, 8/30 Filing	OSS-2	ADD: <u>Business Rule</u> - Add the words "loss of functionality" to the measure.	Yes			
6	BST	Pg 5, 8/30 Filing	OSS-2	ADD: <u>Disaggregation</u> - Add "per OSS interface" to the Regional level of Disaggregation.	Yes			
7	BST	Pg 5, 8/30 Filing	0-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes			
8	BST	Pg 6, 8/30 Filing	0-1	ADD: <u>Calculation</u> - Add the words "for returned acknowledgements" to the sum of all response interval in numerator.	Yes			
9	BST	Pg 6, 8/30 Filing	0-1	<u>Calculation</u> - Change denominator to include acknowledgement notices returned in reporting period.	Yes			
10	BST	Pg 6, 8/30 Filing	O-2	MODIFY: Benchmark - From 100% to 99.5% for TAG	Yes			
11	BST	Pg 6, 8/30 Filing	O-3	ADD: Exclusion - Scheduled OSS Maintenance	Yes			

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			BellSou	OF AGREED ISSUES th Performance Assessment Plan Six Month Review of October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
12	BST	Pg 7, 8/30 Filing	LSR Flow- Through Matrix	DELETE: Remove LSR Flow-Through Matrix from the SQM Agreement reached at workshop not to delete, but to include an "as of date"	Yes
13	BST	Pg 7, 8/30 Filing	LSR Flow- Through Matrix	ADD: SQM directions for locating the latest version of the Flow-Through Matrix on PMAP	Yes
14	BST	Pg 9, 8/30 Filing	P-2	SPLIT MEASUREMENT: P-2A - Jeopardy Notice Interval P-2B - % of Orders Given Jeopardy Notices	Yes
15	BST	Pg 9, 8/30 Filing	P-2	ADD: <u>Exclusion to P-2A</u> - Orders issued with a due date of 48 hours of less.	Yes
16	BST	Pg 12, 8/30 Filing	P-12	DELETE: Eliminate measurement P-12 (LNP-Avg Disconnect Timeliness Intvl & Disconnect Timeliness Intvl Dist)	Yes
17	BST	Pg 12, 8/30 Filing	P-13B P-13C	ADD: P-13B (LNP-Avg Time Out of Svce for LNP Conversions) and P-13C (LNP-% of Time BST Applies the 10-digit Trigger Prior to the LNP Order Due Date) Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.	Yes
18	BST	Pg 15, 8/30 Filing	B-4, B-5, B-6	MODIFY BENCHMARK: BST proposes benchmarks be adopted for these three billing measures, rather than retail analogs	Yes
19	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: <u>Exclusion</u> - 1)trunk groups blocked due to ALEC network/equipment failure	Yes
20	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: Exclusion - 4)final groups actually overflowing, not blocked	Yes

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			BellSou	OF AGREED ISSUES th Performance Assessment Plan Six Month Review of October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
21	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	MODIFY BUSINESS RULES: Categories 1, 10 & 16 are all "BST affecting" and should be added to the "BST affecting categories"	Yes
22	BST	Pg 17, 8/30 Filing	C-2	MODIFY BUSINESS RULE: Define the end time as the time when BST notifies the ALEC, not when the ALEC accepts the arrangement.	Yes
23	BST	SEEM Admin. Plan Sec. 2.2	N/A	ADD LANGUAGE UNDERLINED: BellSouth will make performance reports available to each ALEC on a monthly basis. The reports will contain information collected in each performance category and will be available to each ALEC via the Performance Measurements Reports website.	Yes
24	BST	SEEM Admin. Plan Sec. 2.3	N/A	ADD LANGUAGE UNDERLINED: Final validated SQM reports will be posted no later than the last day of the month following the data month in which the activity is incurred, or the first business day thereafter.	Yes
25	BST	SEEM Admin Plan Sec. 2.5	N/A	ADD LANGUAGE UNDERLINED: Such penalty shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the end of the reporting month in which the late publication of the report occurs.	Yes
26	BST	SEEM Admin Plan	N/A	INSERT NEW SECTION 2.7 TO STATE: Tier II SEEMS payments and Administrative fines and penalties for late, incomplete, and reposted reports will be sent via Federal Express to the Commission. Checks and the accompanying transmittal letter will be postmarked on or before the 15th of the month.	Yes

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TABLE OF AGREED ISSUES Florida Bell South Performance Assessment Plan Six Month Review as of October 22, 2002 Reference **Parties** Metric Proposal Original Proposer Agree A. 40 - 5 3.7 No." Yes INSERT NEW SECTION 2.9 TO STATE: SEEM N/A 27 **BST** BellSouth will provide documentation of late and Admin incomplete occurences during the reporting month Plan that the data is posted to the website. These notations may be viewed on the Performance Measurements website from the PMAP home page on the Current Month Site Updates link The state of the s SQM Changes-Exhibit 3 In the 4th paragraph of the Introduction section of the Yes Exhibit 3 Intro-**BST** 28 SQMP, change "This document is intended for use by duction someone with knowledge of the telecommunication industry,..." In the 5th paragraph of the Introduction section of the Yes Exhibit 3 BST Intro-29 SQMP, change: "Once it is approved, the most duction current copy of this document can be found on the web at URL: https://pmap.bellsouth.com in the Help Documentation Downloads folder. Yes In the Business Rules, change the phrase: "...when the OSS-1 Exhibit 3 BST 30 appropriate response is returned to the client application" to "when the appropriate response is received by the client application." In the Business Rules, add the following sentence: Yes OSS-1 Exhibit 3 31 **RST** BST will not schedule maintenance during the hours from 8:00 am until 9:00 pm, Monday through Friday. Yes In the Calculation, add the following formula: OSS-1 Exhibit 3 32 **BST** % within interval=(e/f) X 100 e=Sum of Response Time for Interval f=# of Legacy Requests During the Reporting Period for System "for which a response was provided" Delete the OASISCAR, OASISLPC, and OASISMTN Yes OSS-1 Exhibit 3 BST 33 from the Legacy System Access Times table.

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
34	BST	Exhibit 3	OSS-2	Change the title and calculation of this measure from "Interface Availability" to "OSS Availability"	Yes
35	BST	Exhibit 3	OSS-3	Change the title and calculation of this measure from "Interface Availability" to "OSS Availability"	Yes
36	BST	Exhibit 3	OSS-3	Calculation change: OSS Availability (a/b) x 100 a=Functional Availability of front end systems b= Scheduled Availability of front end systems Agreement reached at workshop to delete reference to "front end systems"	Yes
37	BST	Exhibit 3	OSS-3	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, per OSS interface"."	Yes
38	BST	Exhibit 3	OSS-3	Move the OSS Interface Availability and the SEEM OSS Interface Availability to Appendix C and change the OSS Interface "LNP" to "LNP Gateway".	Yes
39	BST	Exhibit 3	OSS-4	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, Per OSS Interface."	Yes
40	BST	Exhibit 3	PO-2	Business Rules-Delete references to "RoboTAG".	Yes
41	BST	Exhibit 3	PO-2	Changes to Data Retained: Relation to CLEC Experience Report Month Legacy Contract Response Interval Regional Scope Total Number of Inquiries SI Interval State and Region	Yes
42	BST	Exhibit 3	O-9	Definition change: Interval for Return of a FOC Interval is the average response time from receipt of a valid LSR or ASR to distribution of a FOC. The interval will include an electronic facilities check.	Yes

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Original	Proposer	Reference	Metric	Proposal	Parties Agree
Ne	BST	Exhibit 3	P-4A	Change to Report Structure: Residence & Business reported in day intervals = 0,1,2,3,4,5,5+ UNE and Design reported in day intervals = 0-5,5-10,10-15,15-20,20-25,25-30,>-30 0-25, >5-<=10, >10-<=15, >15-<=20,>20-25, >25-+30,>30 ISDN Orders included in Non-Design Geographic Scope State	Yes
51	BST	Exhibit 3	P-4A	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes
52	BST	Exhibit 3	P-5	Business Rule Change: For non mechanized orders the end time will be date and timestamp of order update from the FAX record via LON or C SOTS system. For the retail analog, the start time is when the technician completes the order and the end time is when the order status is changed to complete in SOCS. Agreement reached at workshop to delete strikeout of first sentence and include the language.	Yes
53	BST	Exhibit 3	P-5	Report Structure Change: Reporting intervals in Hours; 0, 1-<=2,>2-4,>4- <=8,>8-<=12,>12-<=24,>24 plus Overall Average Hour Interval Average Hour Interval (The categories are inclusive of these time intervals; 0-1-0-0.99;1-2-1-1.99; 2- 4+2-3.99, etc.)	Yes
54	BST	Exhibit 3	P-5	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes

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TABLE OF AGREED ISSUES Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002

Original No.	Proposer	Reference		Proposal	Parties Agree
43	BST	Exhibit 3	P-1	Changes to Exclusions: Orders with apptint code of "A" for Rural orders. Orders with an Apptint Code of "A", i.e. orders for locations requiring special construction including locations where no address exists and a technician must make a field visit to determine how to get facilities to the location.	Yes
44	BST	Exhibit 3	P-3	Change to Exclusions: Order Activities of BST or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) Order types may be coded C, N, R, or T.	Yes
45	BST	Exhibit 3	P-3	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes
46	BST	Exhibit 3	P-3A	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes
47	BST	Exhibit 3	P-4	Change to Report Structure: Residence & Business reported in day intervals 0,1,2,3,4,5,5+ ISDN Orders included in Non-Design	Yes
48	BST	Exhibit 3	P-4	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes
49	BST	Exhibit 3	P-4A	Change to Business Rules: The interval breakout for UNE is: 1,2,3,4,5+ and Design is: 0-5,>5-,=10,>10<=15,>15-<=20,>20- <=25,>25-<=30,>30 0-5-0, <5,5-10-5, <10,10-15-10, <15, 15-20-15, <20, 20-25-20, <25,25-30-25, <30,>-30-30 and greater	Yes

		Florida	BellSou	OF AGREED ISSUES th Performance Assessment Plan Six Month Review of October 22, 2002	
Original.	Proposer	Reference	Metric	Proposal	Parlits Agree
55	BST	Exhibit 3	P-7A	Business Rule Change: 1. DST performs the hot cut, notifies the CLEC by telephone: 2. DST performs the hot cut and attempts to notify the CLEC by telephone, but receives no answer and leaves a phone message:	Yes
56	BST	Exhibit 3	P-7B	Calculation Change: Average Recovery Time=(c/d)	Yes
57	BST	Exhibit 3	P-8	Change the Title of this measure by replacing the word "Tested" with the phrase "Passing Cooperative Testing".	Yes
58	BST	Exhibit 3	P-8	Definition Change: A loop will be considered successfully cooperatively tested when both the CLEC and HLEC BST representatives agree that the loop has passed the cooperative testing meets the technical specifications set forth in TR 73600.	Yes
59	BST	Exhibit 3	P-9	Business Rule Change: Measures the quality and accuracy of completed orders. The first trouble report from a received after service order after completion is counted in this measure.	Yes
60	BST	Exhibit 3	M&R-1	Definition Change: The percent of <u>customer</u> trouble reports not cleared by the committed date and time.	Yes
61	BST	Exhibit 3	M&R-1	Calculation Change: % of Missed Repair Appts=(a/b) x 100 a=Count of Customer Troubles Not Cleared by the Quoted Commitment Date and Time b=Total Customer Trouble reports closed in Reporting Period	Yes

		Florida	BellSou	th Performance Assessment Plansix Month Review sof October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
62	BST	Exhibit 3	M&R-2	Definition Change: Initial and repeated customer direct or referred customer troubles reported within a calendar month per 100 lines/circuits in service.	Yes
63	BST	Exhibit 3	M&R-2	Calculation Change: a=Count of Initial and Repeated <u>Customer</u> Trouble Reports closed in the Current period b=Number of Service Access Lines in service at End of the Report Period	Yes
64	BST	Exhibit 3	M&R-3	Calculation Change: Maintenance Duration=(a-b) a=Date and Time of Service Restoration b=Date and Time <u>Customer</u> Trouble Ticket was Opened Avg Maintenance Duration=(c/d) c=Total of all maint durations in the reporting period d=Total Closed <u>Customer</u> Troubles in the reporting period	Yes
65	BST	Exhibit 3	M&R-4	Definition Change: Closed customer trouble reports on the same line/circuit as a previous customer trouble report received within 30 calendar days as a percent of tota! customer troubles closed reported.	Yes
66	BST	Exhibit 3	M&R-4	Calculation Change: % Repeat <u>Customer</u> Troubles within 30 Days- (a/b)x100 a=Count of closed Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days. B=Total <u>Customer</u> Trouble Reports Closed in Reporting Period.	Yes

		Florida	BellSou	OF AGREED ISSUES th Performance Assessment Plan Six Month Review of October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
67	BST	Exhibit 3	M&R-4	Data Retained Change: Relating to CLEC Experience: Total and % Repeat <u>Customer</u> Trouble Reports within 30 Days (TOT_REPEAT) Relating to BST Performance Total and % Repeat <u>Customer</u> Trouble Reports within 30 Days	Yes
68	BST	Exhibit 3	M&R-5	Definition Change: For Out of Service <u>Customer</u> Troubles (no dial tone, cannot be called or cannot call out (the percentage of Total OSS <u>Customer</u> Troubles cleared in excess of 24 hours (All design services are considered to be out of service).	Yes
69	BST	Exhibit 3	M&R-5	Business Rule Change: Customer Trouble reports that are out of service and cleared in excess of 24 hours. The clock begins when the <u>customer</u> trouble report is created in LMOS/WFA and the <u>customer</u> trouble is counted if the elapsed time exceeds 24 hours.	Yes
70	BST	Exhibit 3	M&R-5	Calculation Change: Out of Service (OOS)>24 Hours=(a/b) x 100 a=Total Cleared Custome: Troubles OOS>24 Hours b=Total OOS Customer Troubles in Reporting Period	Yes
71	BST	Exhibit 3	M&R-6	Definition Change: This report measures the average time a customer is in queue when calling a BST Repair Center.	Yes
72	BST	Exhibit 3	B-1	Calculation Change: Invoice Accuracy=[(a-b)/a x 100) a=Absolute Value of Total Billing Revenues during current month b=Absolute Value of Total Billing Related Adjustments during current month.	Yes
73	BST	Exhibit 3	B-1	Report Structure Change: Number of Adjustments	Yes

		Florida	Dell'Con	th Performance Assessment Plan Six Month Review of October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
74	BST	Exhibit 3	B-1	Data Retained Change: Change the phrase "Billing Related Adjustments" to "Total Billing Related Adjustments" for both CLEC Experience and BST Performance.	Yes
	BST	Exhibit 3	B-2	Definition Change	Yes
75	BST	Exhibit 3	B-2	Business Rule Change	Yes
76	BST	Exhibit 3	B-2	SQM Analog/Benchmark Change: CRIS based invoices will be released for delivery within 6 business days; CRIS based invoices will be released for delivery within 8 calendar days; CLEC Avg Delivery Intervals for both CRIS and CABS Invoices are comparable to BST Avg delivery for both systems.	Yes
78	BST	Exhibit 3	B-4	Report Structure Change: Remove "BellSouth Aggregate".	Yes
79	BST	Exhibit 3	B-4	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
80	BST	Exhibit 3	B-5	Report Structure Change: Remove "BellSouth Aggregate".	Yes
81	BST	Exhibit 3	B-5	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
82	BST	Exhibit 3	B-6	Report Structure Change: Remove "BellSouth Aggregate".	Yes
83	BST	Exhibit 3	B-6	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes

		Florida	BellSou	OF AGREED ISSUES th Performance Assessment Plan Six Month Review of October 22, 2002	
Original No.	Proposer	Reference	Metric	Proposal ***	Parties Agree
84	BST	Exhibit 3	B-7	Business Rule Change: Add sentence: The count of fractional recurring charges in the calculation refers to a sum of absolute total dollar values either billed on the correct bill or the absolute value of total fractional recurring charges on the bill. Agreement reached at workshop to delete the word "correct" from the denominator.	Yes
85	BST	Exhibit 3	B-8	Business Rule Change: Add sentence: The count of non-recurring charges in the calculation refers to a sum of absolute total dollar values wether billed on the correct bill or the absolute value of total non-recurring charges on the bill.	Yes
86	BST	Exhibit 3	B-10	Title, Calculation, and Data Retained Change: Inserting "Business" before "Days".	Yes
87	BST	Exhibit 3	C-1	Definition Change: Measures the avg time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of app fee if required) to the date BST returns a response electronically or in writing. Within 10 the number of calendar days as designated by the Collocation Order after having received a bona fide application for physical collocation, BST must respond as to whether space is available or not with space availability and a price quote.	Yes
88	BST	Exhibit 3	C-2	SQM Analog/Benchmark Change: Virtual-Augment-45 60 Calendar Days (Without Space Increase).	Yes
89	BST	Exhibit 3	CM-3	Definition Change: Measures whether CLECs received requirements or business rule documentation on time to prepare for BST interface/system changes so CLEC interfaces are not impaired by change as set forth in the Change Control Process governed by the CLEC/BST Review Board:	Yes

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TABLE OF AGREED ISSUES

Florida BellSouth Performance Assessment Plan

Six Month Review

Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
90	BST	Exhibit 3	CM-3	Business Rule Change: This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames set forth in the Change Control Process a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/cp_live/index.html . The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.	Yes
91	BST	Exhibit 3	CM-9	Calculation Change: The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects, without a mechanized work around.	Yes
92	BST	Exhibit 3	Report Pub Dates	In the last sentence of this section, change: "BST shall retail the performance measurement raw data files Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of 3 years.	Delete
93	BST	Exhibit 3	P-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	, Delete.
94	BST	Exhibit 3	P-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
95	BST	Exhibit 3	P-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

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Florida BellSouth Performance Assessment Plan

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Original	Proposer	Reference	Metric	Proposal	Parties Agree
- No ; 96	BST	Exhibit 3	P-3A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
97	BST	Exhibit 3	P-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
98	BST	Exhibit 3	P-4A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
99	BST	Exhibit 3	P-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
100	BST	Exhibit 3	P-7	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
101	BST	Exhibit 3	P-7A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
102	BST	Exhibit 3	Р-7В	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

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TABLE OF AGREED ISSUES

Florida BellSouth Performance Assessment Plan Six Month Review as of October 22, 2002

Original No.	Proposer	Reference	Metric	Proposal	Parties. Agree
103	BST	Exhibit 3	P-7C	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
104	BST	Exhibit 3	P-8	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
105	BST	Exhibit 3	P-9	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
106	BST	Exhibit 3	P-10	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
107	BST	Exhibit 3	M&R-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
108	BST	Exhibit 3	M&R-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
109	BST	Exhibit 3	M&R-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

		Florida			
Original	Proposer	Reference	Metric	of October 22, 2002 Proposal	Parties - Agree
110	BST	Exhibit 3	M&R-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete .
111	BST	Exhibit 3	M&R-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete
112	BST	Exhibit 3	DUI-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the raw data Supporting Data Files (SDF).	Delete

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				Six Month Review as of October 22, 2002	
Original	Proposer	Ref	Metric	Proposál	Parties Agree
113	ALEC	Pg 8, 8/30 Filing	PO-1	ADD to Tier 1	Yes
114	ALEC	Pg 8, 8/30 Filing	PO-2	ADD to Tier 1	Yes
115	ALEC	Pg 8, 8/30 Filing	ADM	Independent SEEM audit is necessary. ALECs want audit of BST's PARIS reports to ensure the remedy pmts are accurate.	Yes
116	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Tier I Metric	Yes
117	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Calc Remedy Amt on Web Site	Yes
118	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Adjustment	Yes
119	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis Restated Remedy Calculation	Yes
120	ALEC	Pg 16, 8/30 Filing	NEW SQM	ADD: <u>SOM</u> - % of Time BST Applies the 10 Digit Trigger Prior to the LNP Order Due Date; % Out of Service<60 Minutes; and LNP Avg Disconnects Timeliness Intvl & Disconnect Timeliness Intvl Dist (Non-Trigger) Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.	Yes

		Flori	da BellSo	E OF AGREED ISSUES outh Performance Assessment Plan Six Month Review as of October 22, 2002	
Original	Proposer	Ref	Metric	Proposal	Parties Agree
#^- 121	ALEC	PG 6, ALEC Modified Redline	OSS-2	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
122	ALEC	PG 8, ALEC Modified Redline	OSS-3	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
123	ALEC	PG 10, ALEC Modified Redline	OSS-4	MODIFY: Disagg to include Appendix D. Agreement reached at workshop that BST will add "footnote of key".	Yes
124	ALEC	PG 15, ALEC Modified Redline	0-1	MODIFY: Calculation of "c" and "d".	Yes
125	ALEC	PG 35, ALEC Modified Redline	O-9	MODIFY: Change exclusion "LCSC" to "center(s)".	Yes
126	ALEC	PG 46, ALEC Modified Redline	P-1	MODIFY: Calculation-replace"for the reporting period" with "from the earliest BST missed appt".	Yes
127	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comment s)	MODIFY: Business Rules-Replace "transmitted" with "delivered".	Yes
128	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comment s)	ADD: Business Rules-For the retail analogue, the start time is when the technician completes the order and the end time is when the order status is changed to complete in SOCs.	Yes

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TABLE OF AGREED ISSUES Florida BellSouth Performance Assessment Plan

Six Month Review as of October 22, 2002

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Original #	Proposer	Ref	Metric	Proposal	Parties Agree
129	ALEC	PG 77, ALEC Modified Redline	P-8	MODIFY: Definition-replace "has passed the cooperative testing" replace with "meets the technical specifications set forth in TR73600".	Yes
130	ALEC	PG 107, ALEC Modified Redline	M&R-7	MODIFY: Definition-Replace "key customer accounts" with "customer impacting".	Yes
131	ALEC	PG 113, ALEC Modified Redline	B-3	ADD: SEEM - Add to Tier I.	Yes
132	ALEC	PG 127, ALEC Modified Redline	B-10	ADD: Calculation - Add "responses due"	Yes
133	ALEC	PG 133, ALEC Modified Redline	ם סטו	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes
134	ALEC	PG 135, ALEC Modified Redline	DUI-2	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes

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TABLE OF AGREED ISSUES

Florida BellSouth Performance Assessment Plan Six Month Review

Original #	Proposer	Ref	Metric	Proposal	Parties Agree
135	ALEC	Pg 2, 8/30 Filing		ADD to SEEM: Severity component	Delete (from this forum only)
136	ALEC	PG 40, ALEC Modified Redline	O-10	ALECs willing to defer SEEM measure until next review.	Delete
137	ALEC	PG 52, ALEC Modified Redline	NEW SQM P-3	ADD: SQM for Percent Missed Initial Installation Appointments	Delete
138	ALEC	PG 58, ALEC Modified Redline	NEW SQM P-4	ADD: SQM for Average Completion Interval (OCI) & Order Completion Interval Distribution	Delete
139	ALEC	PG 68, ALEC Modified Redline	P-6	SEEM: ALECs willing to defer until next review.	Delete
140	ALEC	PG 74, ALEC Modified Redline	P-7B	SEEM: ALECs willing to defer until next review.	Delete
141	ALEC	PG 89, ALEC Modified Redline	P-12	ADD: Business Rules-"The disconnect activity will be performed before the order is completed in SOCs"	Delete
142	ALEC	PG 90, ALEC Modified Redline	P-12	MODIFY; SQM Disagg-Needs to be discussed in context of new LNP measures.	Delete

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TABLE OF AGREED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review

Original #	Proposer	Ref	Metric	Proposal	Parties Agree
143	ALEC	PG 106, ALEC Modified Redline	M&R-6	SEEM: ALECs willing to defer until next review.	Delete
144	ALEC	PG 116, ALEC Modified Redline	B-4	SEEM: ALECs willing to defer until next review.	Delete
145	ALEC	PG 120, ALEC Modified Redline	B-6	SEEM: ALECs willing to defer until next review.	Delete
146	ALEC	PG 121, ALEC Modified Redline	B-7	SEEM: ALECs willing to defer until next review.	Delete
147	ALEC	PG 124, ALEC Modified Redline	B-8	SEEM: ALECs willing to defer until next review.	Delete
148	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace "Region" with "State"	Delete
149	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace "Diagnostic" with "95% within interval"	Delete
150	ALEC	PG 126, ALEC Modified Redline	B-9	ADD: SEEM - Add to Tier I and Tier II.	Delete

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TABLE OF AGREED ISSUES

Florida BellSouth Performance Assessment Plan
Six Month Review

				as of October 22, 2002	Parties Agree
Original #	Proposer	Ref	Metric	Proposal	Failues Agree
151	ALEC	PG 134, ALEC Modified Redline	DUI-1	SEEM: ALECs willing to defer until next review.	Delete
152	ALEC	PG 136, ALEC Modified Redline	DUI-2	SEEM: ALECs willing to defer until next review.	Delete
153	ALEC	PG 138, ALEC Modified Redline	DUI-3	SEEM: ALECs willing to defer until next review.	Delete
154	ALEC	PG 149, ALEC Modified Redline	C-1	SEEM: ALECs willing to defer until next review.	Delete
155	ALEC	PG 151, ALEC Modified Redline	C-2	SEEM: ALECs willing to defer until next review.	Delete
156	ALEC	PG 158, ALEC Modified Redline	CM-5	SEEM: ALECs willing to defer until next review.	Delete

	RED-LINE CHANGES FROM THE BEARINGPOINT ADEQUACY REVIEW
Metric Name	Documentation Improvements (Red-line changes)
OSS-1: Average Response Time and Response Interval (Pre-Ordering/ Ordering)	The Definition, Business Rules, and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 120, BellSouth submitted a red-line SQM to modify the documented SQM text to provide additional clarity regarding the SQM name, as well as the definition, business rules, and calculation sections. These changes are not present in the Permanent Metrics.
OSS-2: Interface Availability (Pre- Ordering/Ordering)	Definition The hours of operation website should be updated to show hours of availability for all appropriate levels of disaggregation. BellSouth references in both the Interim and Permanent Metrics a matrix on its website (http://www.interconnection.bellsouth.com/oss/oss hour.html). This matrix does not list hours of availability for all levels of disaggregation.
OSS-3: Interface Availability (Maintenance & Repair)	Definition The hours of operation website should be updated to show hours of availability for all appropriate levels of disaggregation. BellSouth references in both the Interim and Permanent Metrics a matrix on its website (hour.html). This matrix does not list hours of availability for all levels of disaggregation.
	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 59, BellSouth submitted a red-line SQM to modify the documented SQM text to provide additional clarity regarding the Business Rules documentation. These changes are not present in the Permanent Metrics.
OSS-4: Response Interval (Maintenance & Repair)	Performance Standard The Performance Standard documentation of this SQM should be modified to reflect a benchmark of "Parity with Retail." The benchmark in the Interim Metrics is listed as "Parity with Retail," while the benchmark in the Permanent Metrics is listed as "Average Interval." KPMG Consulting has confirmed that "Parity with Retail" is the correct performance standard for this SQM.
PO-1: Loop Makeup – Response Time – Manual	Business Rules The Business Rules section reference to "mail" should be replaced with "e-mail." BellSouth states the following: "The CLEC Manual Loop Makeup Service Inquiry (LMUSI) process includes inquiries submitted via mail or FAX to BellSouth's Complex Resale Support Group (CRSG)." KPMG Consulting has confirmed that the CRSG does not receive inquiries via mail and believes that this statement refers to electronic mail.
PO-2: Loop Makeup - Response Time - Electronic	Exclusions The Exclusions documentation should be modified to remove the "designated holidays" exclusion. KPMG Consulting believes the exclusion of "designated holidays" is inappropriate for an SQM the measures an automated process.

Metric Name	Documentation Improvements (Red-line changes)
O-1: Acknowledgement Message Timeliness	The Definition and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 112, BellSouth submitted a red-line SQM to add distribution intervals to the documented SQM. These distribution intervals are not present in the Permanent Metrics for this SQM.
	Exclusions The Exclusions documentation should be modified to note the exclusion of "Manually Submitted LSRs." KPMG Consulting notes that no exclusions are listed in the Permanent Metrics. Since the O-1 SQM includes only transactions electronically submitted via EDI or TAG, manually submitted LSRs would not be included in the calculation of this SQM.
O-3: Percent Flow-Through Service Requests (Summary)	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of its response to FL Exception 121, BellSouth modified category three and added a 14th category in the documented SQM. Both additions clarified differences in the flow-through handling of Local Number Portability (LNP) orders. These changes are not present in the Permanent Metrics.
	Calculation The Calculation documentation should be modified to provide additional clarity on the calculation references to clarifications and errors. The Calculation documentation states the following:
	Percent Flow Through = a + [b - (c + d + e + f)] X 100 • a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued • b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO • c = the number of LSRs that fall out for manual processing • d = the number of LSRs that are returned to the CLEC for clarification • e = the number of LSRs that contain errors made by CLECs • f = the number of LSRs that receive a Z status.
	Since clarifications and errors are synonymous, "d" and "e" could be interpreted to double count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "d" refers to auto clarifications only, and "e" refers to clarifications returned from the Local Carrier Service Center (LCSC) to the CLEC.
	The Calculation documentation also states the following: Percent Achieved Flow Through = a + [b-(c+d+e)] X 100 a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued. b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO c = the number of LSRs that are returned to the CLEC for clarification d = the number of LSRs that contain errors made by CLECs e = the number of LSRs that receive Z status
	Since clarifications and errors are synonymous, "c" and "d" could be interpreted to double-count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "c" refers to auto clarifications only, and "d" refers to clarifications returned from the LCSC to the CLEC.

Metric Name	Documentation Improvements (Red-line changes)
0-4: Percent Flow-Through Service Requests (Detail)	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of its response to FL Exception 121, BellSouth modified category three and added a 14th category to the documented SQM. Both additions clarified differences in the flow-through handling of Local Number Portability (LNP) orders. These changes are not present in the Permanent Metrics.
	Calculation The Calculation documentation should be modified to provide additional clarity on the calculation references to clarifications and errors. The Calculation section states the following:
	Percent Flow Through = a + [b - (c + d + e + f)] X 100 • a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued • b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO • c = the number of LSRs that fall out for manual processing • d = the number of LSRs that are returned to the CLEC for clarification • e = the number of LSRs that contain errors made by CLECs • f = the number of LSRs that receive a Z status.
	Since clarifications and errors are synonymous, "d" and "e" could be interpreted to double count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "d" refers to auto clarifications only, and "e" refers to clarifications returned from the LCSC to the CLEC. The Calculation section also states the following:
	Percent Achieved Flow Through = a + [b-(c+d+e)] X 100 • a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued. • b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO • c = the number of LSRs that are returned to the CLEC for clarification • d = the number of LSRs that contain errors made by CLECs • e = the number of LSRs that receive Z status
	Since clarifications and errors are synonymous, "c" and "d" could be interpreted to double-count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "c" refers to auto clarifications only, and "d" refers to clarifications returned from the LCSC to the CLEC.
O-5: Flow-Through Error Analysis	Name of SQM The name of the SQM should be modified to remove "O-5" from the SQM header. KPMG Consulting notes that this measurement has no calculation other than a count; it presents data that is used to assist in the calculation of O-3 and O-4. The removal of "O-5" from the SQM header would make it clear that this measurement has no calculation component.

Metric Name	Documentation Improvements (Red-line changes)
O-8: Reject Interval	Exclusions The Exclusions documentation's holiday exclusion should be labeled as referencing partially mechanized and non-mechanized transactions only. BellSouth lists the following exclusion: "Designated Holidays are excluded from the interval calculation." KPMG Consulting has confirmed that the holiday exclusion is appropriate for partially mechanized and non-mechanized transactions, but that this exclusion is not appropriate for fully mechanized transactions.
	The Exclusions documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time. The hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the websites where current hours of operation can be found.
O-9: Firm Order Confirmation Timeliness	Exclusions The Exclusions documentation's holiday exclusion should be labeled as referencing partially mechanized and non-mechanized transactions only. BellSouth lists the following exclusion: "Designated Holidays are excluded from the interval calculation." KPMG Consulting has confirmed that the holiday exclusion is appropriate for partially mechanized and non-mechanized transactions, but that this exclusion is not appropriate for fully mechanized transactions.
	The Exclusion documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time and therefore, the hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the websites where current hours of operation can be found.
	Report Structure The Report Structure documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 129, BellSouth submitted a red-line SQM to address documented time bucket discrepancies. These changes are not present in the Permanent Metrics.

Metric Name	Documentation Improvements (Red-line changes)
O-10: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual	Exclusions The Exclusions documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time and therefore, the hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the website where current hours of operation can be found.
	Calculation The Calculation documentation should be updated so the FOC Timeliness Interval calculation label and the Average Interval numerator ("c") are renamed. The calculation label and numerator should reflect the measurement of the O-10 SQM, rather than the O-9 SQM. The first calculation shown in this section is listed as follows: FOC Timeliness Interval = (a - b) a = Date and Time Firm Order Confirmation (FOC) for SI with LSR returned to CLEC b = Date and Time SI with LSR received
	KPMG Consulting believes that the calculation heading: "FOC Timeliness Interval" could be misleading since the O-9 SQM measures the FOC Timeliness interval. The second calculation shown in this section is listed as follows: Average Interval = (c + d) • c = Sum of all FOC Timeliness Intervals • d = Total number of Sls with LSRs received in the reporting period The numerator "c" could also be misleading since it also refers to the FOC Timeliness intervals.
O-11: Firm Order Confirmation and Reject Response Completeness	Exclusions The Exclusions documentation should be updated to reflect a "Fatal Rejects" exclusion. BellSouth states the following in the Business Rules documentation: "Mechanized - The number of FOCs or Auto Clarifications sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs." BellSouth defines a Mechanized reject in the Business Rules section of the O-7: Percent Rejected Service Requests text as "either a Fatal Reject or an Auto Clarification." While Auto Clarifications are one type of Reject, Fatal Rejects are not mentioned in the O-11 SQM documentation. BellSouth also does not list Fatal Rejects in the Exclusions section of the O-11 SQM. KPMG Consulting believes that Fatal Rejects should be excluded from this SQM since BellSouth defines a Fatal Reject in the O-7: Percent Rejected Service Requests text as follows: "A Fatal Reject occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR." The O-11 SQM Definition documentation states the following: "A response is expected from BellSouth for every Local Service Request transaction (version)." Since a Fatal Reject is not considered a valid LSR, the exclusion of Fatal Rejects from O-11 would be consistent with the Definition documentation of this SQM as stated above. KPMG Consulting has also confirmed that Fatal Rejects are excluded from this SQM.
O-12: Speed of Answer in Ordering Center	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.

Metric Name	Documentation Improvements (Red-line changes)		
P-1: Mean Held Order Interval & Distribution Interval	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.		
P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	The Calculation, Levels of Disaggregation, and Performance Standard documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 150, BellSouth submitted a red-line SQM to modify the SQM text to provide additional documentation clarity regarding the calculation, levels of disaggregation, and performance standard sections. These changes are not present in the Permanent Metrics.		
	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.		
P-3A: Percent Missed Installation Appointments Including Subsequent	Definition The Definition documentation should be updated to account for the inclusion of subsequent appointments.		
Appointments	Calculation The Calculation documentation should be modified. Percent Missed Installation Appointments = (a + b) X 100 • a = Number of Appointments in Reporting Period past the Original (Date/Time as applicable) Committed and Subsequent Committed Due Date • b = Number of Appointments on Orders Completed in Reporting Period		
	KPMG Consulting believes that "a" could be interpreted that the appointment be counted only if it were past the original committed due date and the subsequent committed due date, which would only count subsequent misses. However, since the P-3 SQM, which measures the percentage of missed initial installation appointments, has not been ordered by the FPSC, the P-3A SQM must include both types of misses: initial and subsequent.		
	"a" should be redefined as "a = (Number of Appointments in Reporting Period past the Original Committed Due Date) + (Number of Appointments in Reporting Period past the Subsequent Committed Due Date)."		
	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.		

Metric Name	Documentation Improvements (Red-line changes)
P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution	Definition The Definition documentation should be modified to include completion notices. The Definition section includes the following statement: "The "Order Completion And Completion Notice Interval" provides the percentages of orders completed within certain time periods." The phrase "orders completed" could imply that only the order completion interval is being measured by this "orders completed" could imply that only the completion interval and the completion notice interval, SQM. Since this SQM measures both the completion interval and the completion notices the statement is not accurate. "Orders completed" should be updated to include completion notices.
	Business Rules The Business Rules documentation should be updated. The Business Rules section includes the following statement: "The accumulated time for each reporting dimension is then divided by the associated total number of orders completed." The phrase "orders completed" could imply that only the order completion interval is being measured by this SQM. Since this SQM measures both only the completion interval and the completion notice interval, the statement is not accurate. "Orders the completed" should be updated to include completion notices. The Business Rules section also completed includes the following statement: "Orders that are worked on zero due dates are calculated with a includes the following statement: "Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched). "Since this SQM measures both the completion interval and the completion notice interval, the text could be misleading and should be removed.
	Calculation The Calculation documentation should be updated. Completion Interval = (a - b) a = Date and Time Completion Notice is sent b = FOC/SOCS date time-stamp (application date) The name of the calculation, "Completion Interval," could imply that only the order completion interval is being calculated. The interval (a - b) measures both the order completion interval and the completion notice interval. The phrase "Completion Interval" could be misleading and should be updated to include completion notices. Average Completion Interval = (c + d) c = Sum of all Completion Intervals d = Count of Orders Completed in Reporting Period

Metric Name	Documentation Improvements (Red-line changes)
P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution (Continued)	The name of the calculation, "Average Completion Interval," could imply that only the average of all completion intervals is being calculated. Both the "c" and "d" variables refer only to completions, not to completions and completion notices and should be updated in the documentation. Order Completion Interval Distribution (for each interval) = (e ÷ f) X 100
·	Order Completion Interval Distribution (for each ansavar)
	 e = Service Orders Completed in "X" days f = Total Service Orders Completed in Reporting Period
	For the reasons stated above, the name of the calculation, "Order Completion Interval Distribution (for each interval)," could also be misinterpreted. Both the "e" and "f" variables refer only to completed service orders, not to completed service orders and completion notices and should be updated in the documentation.
	Report Structure
	The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
	Performance Standard
	The Performance Standard documentation should be modified. KPMG Consulting notes that the retail analog for UNE Digital Loop ³ DS1 is listed as Retail Digital Loop ⁴ DS1. KPMG Consulting has confirmed that the retail analog is, in fact, Retail Digital Loop ³ DS1.
P-5: Average Completion Notice Interval	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
	Performance Standard The Performance Standard documentation should be modified. KPMG Consulting notes that the retail analog for UNE Digital Loop 3 DS1 is listed as Retail Digital Loop 2 DS1. KPMG Consulting has confirmed that the retail analog is, in fact, Retail Digital Loop 3 DS1.
P-6: % Completions/Attempts without Notice or < 24 hours Notice	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7: Coordinated Customer Conversions Interval	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
2-7A: Coordinated Customer Conversions - Hot Cut Timeliness % Within Interval and Average Interval	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7B: Coordinated Customer Conversions — Average Recovery Time	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7C: Hot Cut Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-8: Cooperative Acceptance Testing - % of xDSL Loops Successfully Tested	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-9: % Provisioning Troubles within 30 days of Service Order Completion	Calculation The Calculation documentation should be updated. % Provisioning Troubles within 30 days of Service Order Activity = (a + b) X 100 • a = Trouble reports on all completed orders 30 days following service order(s) completion • b = All Service Orders completed in the previous report calendar month The definition for "a" could be interpreted to include trouble reports for only the 30-day point following service order(s) completion, not trouble reports within 30 days. "a" should be redefined as "a = Trouble reports on all completed orders within 30 days following service order(s) completion."
	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-10: Total Service Order Cycle Time (TSOCT)	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Aetric Name	Documentation Improvements (Red-line changes)
2-11: Service Order Accuracy	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
P-12: LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	Calculation The Calculation documentation should be modified. Disconnect Timeliness Interval Distribution (for each interval) = (e + f) X 100 • e = Disconnected numbers completed in "X" days • f = Total disconnect numbers completed in reporting period "e" should be changed from days to minutes since, as noted below, the time buckets are in minutes.
	Report Structure The Report Structure documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 15, BellSouth submitted a red-line SQM to address the lack of time buckets (<=15 minutes, >15 minutes) in the SQM documentation. The time buckets are not present in the Permanent Metrics SQM.
M&R-1: Missed Repair Appointments	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-2: Customer Trouble Report Rate	Report Structure The Report Structure documentation should be updated to include Dispatch/Non-Dispatch. KPMG Consulting believes that this designation is important and notes that BellSouth's published report for this SQM is reported by Dispatch/Non-Dispatch. The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-3: Maintenance Average Duration	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-4: Percent Repeat Troubles within 30 Days	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
M&R-5: Out of Service (OOS) > 24 Hours	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-6: Average Answer Time – Repair Centers	Exclusions The Exclusions documentation should be updated to list abandoned calls as an exclusion. KPMG Consulting notes that abandoned calls are not listed as an exclusion. Since the SQM is based on the total number of calls answered in the reporting period, abandoned calls cannot be included.
	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
M&R-7: Mean Time To Notify CLEC of Network Outages	The Definition, Business Rules, and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 133, BellSouth submitted a red-line SQM to modify the SQM text to provide additional clarity regarding the definition, business rules, and calculation documentation. These changes are not present in the Permanent Metrics.
	Definition The Definition section should be modified. BellSouth refers to "Key Customer Accounts" in this section, which implies that only key customers are notified. Since all CLECs have the opportunity to subscribe to the notification list, KPMG Consulting believes that the phrase "Key Customer Accounts" should be removed to avoid confusion.
	Report Structure The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
	Performance Standard The Performance Standard documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 161, BellSouth issue a red-line SQM regarding the documentation change of the performance standard from Parity by Design to Parity with Retail. The change is not present in the Permanent Metrics.

Metric Name	Documentation Improvements (Red-line changes)
B-2: Mean Time to Deliver Invoices	The Definition documentation should be modified, as the Business Rules documentation appears to provide a better definition of the SQM, while the Definition documentation appears to contain background information on the SQM. The Definition documentation states the following: "Bill Distribution is calculated as follows: CRIS BILLS-The number of workdays is reported for CRIS bills. This is calculated by counting the Bill Period date as the first work day. Weekends and holidays are excluded when counting workdays. J/N Bills are counted in the CRIS work day category for the purposes of the measurement since their billing account number (Q account) is provided from the CRIS system. CABS BILLS-The number of calendar days is reported for CABS bills. This is calculated by counting the day following the Bill Period date as the first calendar day. Weekends and holidays are included when counting the calendar days." The Business Rules documentation states the following: "This report measures the mean interval for timeliness of billing records delivered to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CABS-based invoices in calendar days." KPMG Consulting believes that the Business Rules documentation as stated above is a more appropriate definition of the SQM. KPMG Consulting also believes that the reference to "records" in the Definition documentation should be changed to "invoices" to remain consistent with the intent of the SQM.
	Business Rules The Business Rules documentation should be modified, as the Definition documentation appears to contain background information on the SQM, while the Business Rules documentation appears to provide a better definition of the SQM. The Business Rules documentation should be modified to state "timeliness of billing records sent to CLECs." The Calculation documentation states the following: Invoice Timeliness = (a - b)
	• a = Invoice Transmission Date
	• b = Close Date of Scheduled Bill Cycle
	The end point for the Invoice Timeliness calculation is the transmission date to the CLEC. The Business Rules state: "This report measures the mean interval for timeliness of billing records delivered to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CABS-based invoices in calendar days." The Business Rules section should be modified to state "timeliness of billing records sent to CLECs," rather than "delivered to CLECs" since BellSouth cannot be held responsible for the billing records after they have been sent.
B-8: Non-Recurring Charge Completeness	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state- specific basis.
D-1: Average Database Update Interval	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Tonsulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
D-2: Percent Database Update Accuracy	The Definition and Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 180, BellSouth submitted a red-line SQM to clarify the documented SQM text. The text in the Permanent Metrics for this SQM does not match the text in the red-line SQM.
	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
	Levels of Disaggregation The Levels of Disaggregation documentation should be updated to include Directory Assistance. There are two levels of disaggregation listed for this SQM: LIDB Directory Listings
	KPMG Consulting notes that BellSouth's published report for this SQM includes a third level of disaggregation: Directory Assistance. BellSouth also refers to Directory Assistance in both the Definition and Business Rules sections.
D-3: Percent NXXs and LRNS Loaded by the LERG Effective Date	Definition The Definition documentation should be modified. KPMG Consulting notes that the first paragraph of the Definition documentation appears to contain the actual SQM definition. The second and third paragraphs appear to contain more background information that would be more appropriately presented in the Business Rules section.
	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
TGP-2: Trunk Group Performance-CLEC Specific	Definition The Definition documentation should be updated to reflect that the SQM is measured on a CLEC specific basis. KPMG Consulting notes that the wording of the definition is exactly the same as the TGP-1 wording definition. While TGP-2 is reported on a CLEC specific basis, TGP-1 is reported on an aggregate basis.
C-1: Collocation Average Response Time	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanen Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state- specific basis.

Metric Name	Documentation Improvements (Red-line changes)
C-2: Collocation Average Arrangement Time	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state- specific basis.
C-3: Collocation Percent of Due Dates Missed	Business Rules The Business Rules documentation should be modified. The Business Rules documentation includes the following statement: "The clock starts on the date that BellSouth receives a complete and accurate Bona Fide firm order accompanied by the appropriate fee if required." KPMG and accurate Bona Fide firm order accompanied by the appropriate fee if required." KPMG Consulting notes that this statement also appears in the Business Rules section of the C-2: Collocation Average Arrangement Time SQM. Since the C-3 SQM measures the percentage of due dates missed, no time intervals are required for the percentage calculation.
	Calculation The Calculation documentation should be modified. The Calculation section includes the following statement: • a = Number of Completed Orders that were not completed within BellSouth Committed Due Date during Reporting Period
	KPMG Consulting notes that "within" should be replaced with "by" since orders cannot be completed within a due date, but can be completed by a due date.
	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state- specific basis.
CM-1: Timeliness of Change Management Notices	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-2: Change Management Notice Average Delay Days	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 69, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics.
	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.

Metric Name	Documentation Improvements (Red-line changes)
CM-3: Timeliness of Documents Associated with Change	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-4: Change Management Documentation Average Delay Days	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 69, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics.
CM-4: Change Management Documentation Average Delay Days (Continued)	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-5: Notification of CLEC Interface Outages	Business Rules The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 81, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics.
	Report Structure The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.